

PERMIT NO. 2861-127-0002-V-07-0

ISSUANCE DATE:



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit

Facility Name: Pinova, Inc.
Facility Address: 2801 Cook Street
Brunswick, Georgia 31520, Glynn County
Mailing Address: 2801 Cook Street
Brunswick, Georgia 31520
Parent/Holding Company: DRT America, Inc.
Facility AIRS Number: 04-13-127-00002

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a Part 70 Permit for:

The operation of a chemical production facility to produce resins, terpene resins, terpene liquids, modified rosins/resins, unmodified rosins/resins, and specialty chemicals.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit. Unless modified or revoked, this Permit expires five years after the issuance date indicated above.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above, for any misrepresentation made in Title V Application TV-459392 signed on May 19, 2020, any other applications upon which this Permit is based, supporting data entered therein or attached thereto, or any subsequent submittal of supporting data, or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **134** pages.



DRAFT

Richard E. Dunn, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION**1.1 Site Determination**

The application did not include any site determination issues.

1.2 Previous and/or Other Names

Hercules Incorporated - Brunswick
Opco-P, Inc.

1.3 Overall Facility Process Description**Milling**

Pinova receives tree stumps by truck. The stumps are processed in the Milling Area by grinding or shredding and conveyed to a silo. From the silo, wood is conveyed to the Extraction unit. Currently, this area of the plant has no air pollution control equipment, and no HAPs are present in the stump handling and milling process.

Primary Area (Extraction, Refinery, and Pexite)

The extractor is fed from the Milling silo via the crown gallery belt and the inlet feed diverter. The diverter discharges into the wood inlet hopper through a rotary valve into the extractor. In the extractor, methyl isobutyl ketone (MIBK) is used to extract the rosin from the milled wood. Vinsol can also be processed in the Extractor via a belt system immediately downstream of the feed silo. Spent wood from the Extractor is conveyed to the desolventizer to remove and recover the MIBK and ultimately be burned in No. 9 Boiler. The crude rosin solution is pumped to a surge tank and is subsequently sent to the refinery for separation of MIBK, crude wood oils, and other impurities. After the refinery, rosin is further processed in the Pexite area using solvents to separate/split the rosin based on polarity.

Hard Resins

Hard Resins are produced by the batch reaction of rosin/resin feedstock with a polyhydric alcohol (such as glycerol) and/or with other modifiers including polybasic organic acids (such as fumaric acid). Products can be simple esters, adducted esters, complex esters, resins and blends.

Terpene Resins

Terpene Resins are produced by the acid-catalyzed polymerization of feedstocks, including liquid terpenes (such as Sulfate Alpha-pinene) and styrene, to produce polyterpene resins. The reaction is carried out in a diluent using continuous stirred tank reactors. The reaction mixture is water washed, dechlorinated, filtered and evaporated to produce the finished product resin.

Terpene Liquids (Stillhouse)

Terpene liquid products are manufactured by the fractional distillation of feedstocks including Terpene oils extracted from pine wood chips, crude sulfate turpentine, synthetic terpenes, citrus limonene and others. Both continuous and batch distillations are used. Products can be specific distillation fractions or blends of distillation cuts.

Modified Rosins/Resins (Stabelite/Foral)

Resins are modified through the saponification, hydrogenation/dehydrogenation or polymerization of the substance.

Unmodified Rosins/Resins

Resins/Rosins are obtained during the solvent refining or distillation stages of raw materials or products.

Specialty Chemicals Plant (SCP)

Additional products are formed by the esterification or other reaction of raw materials and products. These include synthetic resins, vulcanization agents, synthetic wax and ester gum.

PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

2.1 Facility Wide Emission Caps and Operating Limits

None applicable.

2.2 Facility Wide Federal Rule Standards

None applicable.

2.3 Facility Wide SIP Rule Standards

None applicable.

2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None applicable.

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PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1 Emission Units

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices		Stack ID
ID No.	Description		ID No.	Description	
PRIMARY PROCESSING					
PFG1	Sawdust Handling	391-3-1-.02(2)(n)	None	None	None
MG01	Millroom Operations (M001-8, MF02-7)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None	None
CT01	Cooling Tower	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart FFFF	None	None	None
EXTRACTION/REFINERY					
EBG1	Old Extractor Group ¹ (EB01, EB04)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 52.21 40 CFR 63 Subpart FFFF	EBC1 EBC4	Oil Scrubber Old Extractor Spray Tower #1 Old Extractor Vent System	EBS1
EXG1	Crown Extractor ¹ Desolventizer Pre-Evaporator System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart FFFF	EAC1 EAC3	Crown Oil Scrubber Crown Area Spray Tower	EAS1
EAG1	Spent Wood Conveyors Spent Wood Diventillator	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart FFFF	EAC1 EAC2	Crown Oil Scrubber Crown Area Spray Tower	EAS1
PEXITE PLANT					
PXG1	Resin Refining ² (PX01-PX04)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart FFFF	PXC0 PXC1 PXC2	Pexite Water Spray Tower Pexite Plant Packed Tower Scrubber Pexite Plant PS2 Condenser	PXS1 PXS2
VINSOL AREA					
VG01	Vinsol Bagging	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 64	VC01- VC04	Dust Collectors (4)	VS01 VS02 VS03 VS04
VF04	Vinsol Group (V007, V008, VF01-VF03)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None	VS07 VS08
CHEMICAL PLANT					
CPG1	Chemical Plant Reactors RP-1 through RP-3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None	CPS4
DISTILLATION					
SHG1	Still House Batch Stills (17, 25, 27, 29, & 31) Continuous Distillation Columns ²	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart FFFF	SC40	Condenser	SS40
S021	Continuous Still No. 21 ²	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart FFFF	SC40	Condenser	SS40

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Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices		Stack ID
ID No.	Description		ID No.	Description	
STAYBELITE/FORAL AREA					
SAG1	Staybelite Reactors SA03 (4) Foral Resin Reactors SA03 (4)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 52.21	SAC3	Packed Tower Scrubber	SAS3 SAS5 SAS3
SA04	Staybelite Still	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SAC4	Primary Condenser	SAS4
SA05	Staybelite Thermal Transfer Fluid System (2 - 2 MMBTU/hr boilers)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SAC5	Condenser	SAS5
HARD RESINS AREA					
HRG1	Hard Resins Kettles A-F ¹	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart FFFF 40 CFR 60 Subpart VV	HRT0	Regenerative Thermal Oxidizer	HRT0
HRG2	Hard Resins Hoppers & Bagging	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	HRC7 HRC8 HRC9	Baghouse Baghouse Baghouse	HRS7 HRS8 HRS9
HRG3	Hard Resins Belt Molten Feed	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	HRVS	Venturi Scrubber	HRS3
HR01	Hard Resin Dowtherm Boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None	HRS1
TERPINE RESINS					
TR02	Terpene Resins Reactors R-5 & R-6 ²	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart FFFF	TRC2	Wash System Condenser	TRS2
TR03	Terpene Resins Dechlorinators R-19A & R-19B ²	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart FFFF	TRC3	Dechlor Condenser	TRS3
TR04	Terpene Resins Lochem Filter ²	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart FFFF	TRC4	Condenser E26	TRS4
TR07	Terpene Resins LTC Evaporation System (including Evaporator, Still Column, & Stripper Column) ²	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart FFFF	TRC7 TRC8	Jet After-Condenser Spare Condenser	TRS7
TR08	Terpene Resins Hot Oil Heater	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None	TRS8
LIQUID RESINS/SPECIALTY CHEMICAL PROCESSING (SCP)					
SP01	SPC Ester Kettle R-403 ^{2**}	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart FFFF	SPC1	Spray Tower	SPS1
SP06	SCP Resins Dowtherm Boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None	SPS6
LRG1	Liquid Resins Stills & Towers (LR1A-D) ¹	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 52.21 40 CFR 63 Subpart FFFF Georgia Air Toxics (Methanol)	LRC1 LRC2	Venturi Scrubber Packed Tower Scrubber	SPS2
LR02	Liquid Resins Xceltherm Vaporizer	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None	LRS2
TEG2	Storage Tanks (Methanol) (T104 & T130) ¹	40 CFR 63 Subpart FFFF	LRC1 LRC2	Venturi Scrubber Packed Tower Scrubber	LRS2
N/A	Methanol Transfer Operations	40 CFR 63 Subpart FFFF	LRC1 LRC2	Venturi Scrubber Packed Tower Scrubber	LRS2

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Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices		Stack ID
ID No.	Description		ID No.	Description	
POWER PLANT OPERATIONS					
P009	No. 9 Boiler – Hybrid Suspension Grate Boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 63 Subpart DDDDD 40 CFR 64	PC9A PC9B	Multiclone Venturi Scrubber	PS09
P010	No. 10 Boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 60 Subpart Db 40 CFR 63 Subpart DDDDD	None	None	PS10

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

¹Group 1 status with regard to 40 CFR 63 Subpart FFFF

²Group 2 status with regard to 40 CFR 63 Subpart FFFF

**Group 2 status only applicable when the reactor is used to produce Vinsol Ester Gum

3.2 Equipment Emission Caps and Operating Limits

Extraction/Refinery

- 3.2.1 The extraction process (EXG1) production weight of pale wood rosin shall not exceed 12.5 million pounds per month.
[40 CFR 52.21 Avoidance]

Staybelite/Foral Area

- 3.2.2 The Permittee shall not discharge or cause the discharge into the atmosphere from the Staybelite & Foral Resin Reactors (Source Codes SA03, SA05, SAG1) any gases which contain Volatile Organic Compounds (VOC) emissions in amounts equal to or in excess of 40 tons during any consecutive twelve-month period.
[40 CFR 52.21 Avoidance]
- 3.2.3 The Permittee shall not discharge or cause the discharge into the atmosphere from the Staybelite & Foral Resin Reactors (Source Codes SA03, SA05, SAG1) any gases which contain Hydrogen Sulfide emissions in amounts equal to or in excess of 10 tons during any consecutive twelve-month period.
[40 CFR 52.21 Avoidance]

Hard Resins Area

- 3.2.4 The Permittee shall not discharge or cause the discharge into the atmosphere from the Hard Resins Thermal Oxidizer (Source Code HRTO), any gases which contain emissions on a 24-hour average in excess of the specified limits:
[Georgia Air Toxic Guideline – 391-3-1-.02(a)(1)]
- Acrolein emissions in excess of 0.26 pounds per hour.
 - Fumaric Acid emissions in excess of 2.00 pounds per hour.

- c. Formic Acid emissions in excess of 2.80 pounds per hour.
- d. Adipic Acid emissions in excess of 2.60 pounds per hour.
- e. 4-Tert-Butyl Phenol emissions in excess of 0.70 pounds per hour.
- f. Formaldehyde emissions in excess of 0.40 pounds per hour.
- g. Maleic Anhydride emissions in excess of 0.30 pounds per hour.

Liquid Resins/Specialty Chemical Processing (SCP)

- 3.2.5 The Permittee shall not discharge or cause the discharge into the atmosphere from the Liquid Resins Stills & Towers (Source Code LRG1) any gases which contain methanol in excess of 3.5 lb/hour.
[Georgia Air Toxic Guideline – 391-3-1-.02(a)(1)]
- 3.2.6 The Permittee shall not discharge or cause the discharge into the atmosphere from the Liquid Resins Stills & Towers (Source Code LRG1) any gases which contain Volatile Organic Compounds (VOC) emissions in amounts equal to or in excess of 40 tons during any consecutive twelve-month period.
[40 CFR 52.21 Avoidance]

Power Plant Operations

- 3.2.7 The Permittee shall not combust natural gas in the No. 10 Boiler (Source Code P010) in excess of 1,763 million cubic feet per any twelve consecutive month period.
[40 CFR 52.21 Avoidance]
- 3.2.8 The Permittee shall limit the combined steam production from the No. 9 and No. 10 Boilers (Source Codes P009 & P010) to less than or equal to 1,160,739 tons per any twelve consecutive months.
[40 CFR 52.21 Avoidance]
- 3.2.9 The Permittee shall not discharge or cause the discharge into the atmosphere from the No. 10 Boiler (Source Code P010) any gases which contain carbon monoxide (CO) emissions in excess of 0.170 lb/MM Btu heat input to the boiler while firing natural gas.
[40 CFR 52.21 Avoidance]
- 3.2.10 The Permittee shall not discharge or cause the discharge into the atmosphere from the No. 10 Boiler (Source Code P010) while firing natural gas any gases which contain nitrogen oxide (NO_x) emissions in excess of the following:
[40 CFR 52.21 Avoidance and 40 CFR 60.44b(a) subsumed]
 - a. 0.046 lb/MMBtu heat input
[40 CFR 52.21 Avoidance]

- b. 0.10 lb/MMBtu, expressed as NO₂, for low heat release rate ($\leq 70,000$ Btu/hr-ft³)
[40 CFR 60.44b(a)]
- c. 0.20 lb/MMBtu, expressed as NO₂ for high heat release rate ($> 70,000$ Btu/hr-ft³)
[40 CFR 60.44b(a)]

3.2.11 The Permittee shall combust only natural gas in the No. 10 Boiler (Source Code P010).
[391-3-1-.02(a)3, 40 CFR 63 Subpart DDDDD]

3.3 Equipment Federal Rule Standards

General

- 3.3.1 The Permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS), 40 CFR 60, Subpart A – “General Provisions”.
[40 CFR 60 Subpart A]
- 3.3.2 The Permittee shall comply with all applicable standards, provisions and requirements of 40 CFR 60 Subpart Db “Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units” for the No. 10 Boiler (Source Code P010).
[40 CFR 60 Subpart Db]
- 3.3.3 The Permittee shall comply with all applicable provisions of 40 CFR 63 Subpart FFFF – “National Emission Standard for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing.”
[40 CFR 63.2445(b)]
- 3.3.4 The Permittee shall implement and maintain a liquid leak detection to comply with leak detection and repair provision of 40 CFR Part 63 Subpart UU for process equipment in HAP service in the Extraction/Refinery, Pexite, Hard Resins production, Distillation, Liquid Resins/(SCP) areas (MIBK washout of R-403, if in HAP service greater than 300 hours per year), and Terpene Resins area when styrene is processed. This requirement does not apply to equipment in vacuum service.
[40 CFR Part 63 Subpart UU]

40 CFR 60 Subpart VV

- 3.3.5 The Permittee shall comply with all applicable standards, provisions and requirements of 40 CFR 60 Subpart VV – “Standards of Performance for Equipment Leaks of VOC in Synthetic Organic Chemicals Manufacturing Industry” for the Hard Resins Processing area (Source Code HRG1) and associated processing equipment. Associated record keeping and reporting are included in Condition 5.2.7.
[40 CFR 60 Subpart VV]

40 CFR 60 Subpart NNN Avoidance

- 3.3.6 For chemicals listed in 40 CFR 60.667, including MIBK and methanol, the Permittee shall not use the recovered chemicals in any other process except the process from which it is recovered.
[40 CFR 60 Subpart NNN Avoidance per US EPA Applicability Determination Control Number NS19, 391-3-1-.02(2)(d)(3)]

40 CFR 63 Subpart FFFF

- 3.3.7 The Permittee shall control organic HAP emissions from all Group 1 batch process vents as follows:
[Table 2 of 40 CFR 63 Subpart FFFF; 40 CFR 63.2460(a)]
- a. Reduce collective uncontrolled organic HAP emissions from the sum of all vents by at least 98 percent by weight by venting emissions from a sufficient number of vents through a closed vent system to the control device; or
 - b. Reduce uncontrolled organic HAP emissions from one or more vents to an outlet concentration less than or equal to 20 ppmv as TOC or total organic HAP by venting through a closed vent system to the control device. For all other vents, the Permittee shall reduce collective organic HAP emissions as specified in paragraph a. of this condition.
- 3.3.8 The Permittee shall control organic HAP emissions from all continuous Group 1 process vents subject to Subpart FFFF as follows:
[Table 1 of 40 CFR 63 Subpart FFFF; 40 CFR 63.2455(a)]
- a. Reduce emissions of total organic HAP by ≥ 98 percent by weight or to an outlet process concentration ≤ 20 ppmv as organic HAP or TOC by venting emissions through a closed-vent system to any combination of control devices (except a flare); or
 - b. Reduce emissions of total organic HAP by venting emissions through a closed-vent system to a flare; or
 - c. Use a recovery device to maintain the TRE above 1.9 for an existing source or above 5.0 for a new source.
- 3.3.9 The Permittee shall reduce total HAP emissions from all Group 1 storage tanks in emission unit TEG2 by the following methods. The emission limit for control devices used to control emissions from storage tanks does not apply during periods of planned routine maintenance. Periods of planned routine maintenance of each control device, during which the control device does not meet the emission limit, must not exceed 240 hours per year.
[40 CFR 63.2470(a) and (d), Table 4 – 1.b.ii, Table 4-2]

- a. For Group 1 storage tanks for which the maximum true vapor pressure of total HAP at the storage temperature is less than 76.6 kPa, reduce total HAP emissions by a minimum of 95% by weight or to a concentration of 20 ppm or less as TOC or total organic HAP; or
 - b. As an alternative operating scenario, if the process is down and steam is off the building, scrubber flow can be shut down as long as the vent line pressure auto valve is closed and the auto valve pressure is set to less than the tank's pressure relief setting, resulting in no emissions to the atmosphere from the tanks. Upon shutdown of the operating area, Venturi Scrubber LRC1 and Packed Tower Scrubber LRC2 must be run for an additional 4 hours to ensure that the area tanks are cool. In addition, the operator must check the automated vent line valve to ensure that it is in the closed position prior to shutting down the scrubber. Venturi Scrubber LRC1 and Packed Tower Scrubber LRC2 must be operating to reduce total HAP emissions as described in section a. of this condition when transferring material into the TEG2 tanks or heat up of tanks in the process.
- 3.3.10 Beginning no later than August 12, 2023, for Group 1 storage tanks during shutdown operations (i.e., emptying and degassing of a storage tank), the Permittee must comply with the following paragraphs until the vapor space concentration in the storage tank is less than 10% of the LEL. The Permittee must determine the LEL using process instrumentation or portable measurement devices and follow procedures for calibration and maintenance according to manufacturer's specifications.
[40 CFR 63.2470(f)]
- a. Remove liquids from storage tank as much as practicable.
 - b. Comply with one of the following:
 - i. Reduce emissions of total organic HAP by 95 weight-percent by venting emissions through a closed vent system to any combination of control devices.
 - ii. Reduce emissions of total organic HAP by routing emissions to a fuel gas system or process and meet the requirements specified in 40 CFR 63.982(d) and the applicable requirements of 40 CFR 63.2450(e)(4).
 - c. Maintain records necessary to demonstrate compliance with the requirements in 40 CFR 63.2450(u), including, if appropriate, records of existing standard site procedures used to empty and degas (deinventory) equipment for safety purposes.
- 3.3.11 For Group 2 continuous process vents, the Permittee must use a recovery device to maintain the TRE level greater than 1.9 but less than or equal to 5.0 and must comply with the requirements in 40 CFR 63.993 and the requirements referenced therein. If a recovery device is used to maintain the TRE above a specified threshold, the requirements of 40 CFR 63.982(e) and the requirements referenced therein must be met.
[40 CFR 63 Subpart FFFF; 40 CFR 63.2455(c)]

- 3.3.12 The Permittee shall maintain the combustion zone temperature of the Regenerative Thermal Oxidizer (Source Code HRT0) at or above 1575°F or other temperature established through subsequent performance testing approved by the Division.
[40 CFR Part 63.2430]
- 3.3.13 The Permittee must be in compliance with the emission limitations and work practice standards of 40 CFR 63 Subpart FFFF at all times except during periods of startup, shutdown, and malfunction (SSM), and must meet the requirements specified in 40 CFR 63.2455 through 63.2490, except as specified in 40 CFR 63.2450 (b) through (s). The Permittee must meet the notification, reporting, and recordkeeping requirements specified in 40 CFR 63.2515, 63.2520, and 63.2525. After August 12, 2023, the Permittee must be in compliance with the emission limitations and work practice standards of 40 CFR 63 Subpart FFFF at all times. After August 12, 2023, the requirements of 63.2450(t), (u), and (v) also apply.
[40 CFR 63.2450(a)(2)]
- 3.3.14 The Permittee shall comply with the provisions of 40 CFR 63.2475 for Group 1 transfer racks for the operation of the Methanol Loading Rack by either:
[Table 5 of 40 CFR 63 Subpart FFFF; 40 CFR 63.2475]
 - a. Using a vapor balancing system designed and operated to collect organic HAP vapors displaced from tank trucks and railcars during loading and route the collected HAP vapors to the storage tank from which the liquid being loaded originated or to another storage tank connected by a common header.
 - b. Alternatively, the Permittee shall vent emissions through a closed-vent system to the Venturi Scrubber LRC1 and Packed Tower Scrubber LRC2, operated to reduce emissions of total organic HAP by ≥ 98 percent by weight or to an outlet concentration ≤ 20 ppmv as organic HAP or TOC, when transferring into tanks and the transfer truck cannot be vented to the atmosphere. In this operating scenario, a nitrogen purge on the loading dome is used during unloading.
- 3.3.15 The Permittee shall comply with 40 CFR 63.2485 and the record keeping and reporting requirements specified in Condition 6.2.14 for Group 2 process wastewater streams subject to 40 CFR 63 Subpart FFFF.
[40 CFR 63 Subpart FFFF; 40 CFR 63.2485]
- 3.3.16 The Permittee shall comply with the provisions of Condition 6.2.15 for maintenance wastewaters.
[40 CFR 63 Subpart FFFF; 40 CFR 63.2485]
- 3.3.17 The Permittee comply with the provisions of Condition 5.2.10 for cooling water tower systems. The cooling water shall be monitored for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more speciated HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system.
[40 CFR 63 Subpart FFFF; 40 CFR 63.2490]

- 3.3.18 The Permittee shall develop, implement, and maintain written startup, shutdown, and malfunction plans in accordance with 40 CFR 63.6(e)(3) for MCPUs subject to 40 CFR 63 Subpart FFFF. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan in accordance with 40 CFR 63.6(e)(3). Beginning August 12, 2023, the provisions for startup, shutdown, and malfunction plans no longer apply when demonstrating compliance with 40 CFR 63 Subpart FFFF. However, for historical compliance purposes, a copy of the plan must be retained and available on-site for five years after August 12, 2023.
[40 CFR 63 Subpart A; 40 CFR 63.6(e)(1)(ii); 40 CFR 63.6(e)(3); 40 CFR 63.2485(q); 40 CFR 63.2520(e)(4)]
- 3.3.19 No later than August 12, 2023, the Permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Division which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
[40 CFR 63.2450(u)]
- 3.3.20 The Permittee shall meet the applicable requirements of 40 CFR 63.982(c) for the operation of the closed vent systems and control devices used to comply with the provisions of 40 CFR 63 Subpart FFFF.
[40 CFR 63 Subpart FFFF; 40 CFR 63.2450(e)(4); 40 CFR 63 Subpart SS]
- 3.3.21 Beginning August 12, 2023, the use of a bypass line at any time on a closed vent system to divert emissions subject to Tables 1 through 7 of 40 CFR 63 Subpart FFFF to the atmosphere or to a control device not meeting the requirements specified in Tables 1 through 7 of 40 CFR 63 Subpart FFFF is an emissions standards deviation.
[40 CFR 63 Subpart FFFF; 40 CFR 63.2450(e)(6); 40 CFR 63 Subpart SS]
- a. If the bypass monitoring requirements of 40 CFR 63.148(f) of Subpart G are applicable, then the Permittee must continue to comply with the requirements in 40 CFR 63.148(f) of Subpart G and the recordkeeping and reporting requirements in 40 CFR 63.148(j)(2) and (3) of Subpart G, and (h)(3) of Subpart G, in addition to the applicable requirements specified in 40 CFR 63.2485(q), the recordkeeping requirements specified in 40 CFR 63.2525(n), and the reporting requirements specified in 40 CFR 63.2520(e)(12).
[40 CFR 63.2450(e)(6)(i)]

- b. If the bypass monitoring requirements of 40 CFR 63.172(j) of Subpart H are applicable, then the Permittee must continue to comply with the requirements in 40 CFR 63.172(j) of Subpart H and the recordkeeping and reporting requirements in 40 CFR 63.118(a)(3) and (4), and (f)(3) and (4) of Subpart G, in addition to the applicable requirements specified in 40 CFR 63.2480(f) and 63.2485(q), the recordkeeping requirements specified in 40 CFR 63.2525 (n), and the reporting requirements specified in 40 CFR 63.2520(e)(12).
 - c. If the bypass monitoring requirements of 40 CFR 63.983(a)(3) of Subpart SS are applicable, then the Permittee must continue to comply with the requirements in 40 CFR 63.983(a)(3) of Subpart SS and the recordkeeping and reporting requirements in 40 CFR 63.998(d)(1)(ii) and 63.999(c)(2) of Subpart SS, in addition to the requirements specified in 40 CFR 63.2450(e)(4), the recordkeeping requirements specified in 40 CFR 63.2525(n), and the reporting requirements specified in 40 CFR 63.2520(e)(12).
[40 CFR 63.2450(e)(6)(iii)]
 - d. For purposes of compliance with this condition, 40 CFR 63.148(f)(3) of Subpart G, and 63.172(j)(3) of Subpart H, the phrase “Except for equipment needed for safety purposes such as pressure relief devices, low leg drains, high point bleeds, analyzer vents, and open-ended valves or lines” in 40 CFR 63.983(a)(3) of Subpart SS does not apply; instead, the following exemptions apply:
[40 CFR 63.2450(e)(6)(v)]
 - i. Except for pressure relief devices subject to 40 CFR 63.2480(e)(4), equipment such as low leg drains and equipment subject to the requirements specified in 40 CFR 63.2480 are not subject to this condition.
 - ii. Open-ended valves or lines that use a cap, blind flange, plug, or second valve and follow the requirements specified in 40 CFR 60.482-6(a)(2), (b), and (c) or follow requirements codified in another regulation that are the same as 40 CFR 60.482-6(a)(2), (b), and (c) are not subject to this condition.
- 3.3.22 Beginning August 12, 2023, the Permittee may designate a process vent as a maintenance vent if the vent is only used as a result of startup, shutdown, maintenance, or inspection of equipment where equipment is emptied, depressurized, degassed, or placed into service. The Permittee must comply with the requirements of paragraphs a. through c. of this condition for each maintenance vent. Any vent designated as a maintenance vent is only subject to the maintenance vent provisions of this condition and the associated recordkeeping and reporting requirements of 40 CFR 63.2525(p) and 63.2520(e)(14), respectively. The Permittee does not need to designate a maintenance vent as a Group 1 or Group 2 process vent nor identify maintenance vents in a Notification of Compliance Status Report.
[40 CFR 63.2450(v)]

- a. Prior to venting to the atmosphere, remove process liquids from the equipment as much as practical and depressurize the equipment to either: A flare meeting the requirements of 40 CFR 63.2450(e)(2) or (5), as applicable, or a non-flare control device meeting the requirements in 40 CFR 63.2450(e)(4) and the requirements specified in 40 CFR 63.982(c)(2) of Subpart SS until one of the following conditions, as applicable, is met.
[40 CFR 63.2450(v)(1)]
- i. The vapor in the equipment served by the maintenance vent has a lower explosive limit (LEL) of less than 10 percent and has an outlet concentration less than or equal to 20 ppmv hydrogen halide and halogen HAP.
[40 CFR 63.2450(v)(1)(i)]
- ii. If there is no ability to measure the LEL of the vapor in the equipment based on the design of the equipment, the pressure in the equipment served by the maintenance vent is reduced to 5 pounds per square inch gauge (psig) or less. Upon opening the maintenance vent, active purging of the equipment cannot be used until the LEL of the vapors in the maintenance vent (or inside the equipment if the maintenance is a hatch or similar type opening) is less than 10 percent.
[40 CFR 63.2450(v)(1)(ii)]
- iii. The equipment served by the maintenance vent contains less than 50 pounds of total volatile organic compounds (VOC).
[40 CFR 63.2450(v)(1)(iii)]
- iv. If, after applying best practices to isolate and purge equipment served by a maintenance vent, none of the applicable criterion in paragraphs (a) through (c) of this condition can be met prior to installing or removing a blind flange or similar equipment blind, then the pressure in the equipment served by the maintenance vent must be reduced to 2 psig or less before installing or removing the equipment blind. During installation or removal of the equipment blind, active purging of the equipment may be used provided the equipment pressure at the location where purge gas is introduced remains at 2 psig or less.
[40 CFR 63.2450(v)(1)(iv)]
- b. Except for maintenance vents complying with the alternative in paragraph (c) of this condition, the Permittee must determine the LEL or, if applicable, equipment pressure using process instrumentation or portable measurement devices and follow procedures for calibration and maintenance according to manufacturer's specifications.
[40 CFR 63.2450(v)(2)]

- c. For maintenance vents complying with the alternative in paragraph (c) of this condition, the Permittee must determine mass of VOC in the equipment served by the maintenance vent based on the equipment size and contents after considering any contents drained or purged from the equipment. Equipment size may be determined from equipment design specifications. Equipment contents may be determined using process knowledge.
[40 CFR 63.2450(v)(2)]

40 CFR 63 Subpart SS – Closed Vent System Requirements

- 3.3.23 The Permittee shall comply with the applicable requirements of 40 CFR 63.983 for closed vent systems when required by 40 CFR 63 Subpart FFFF.
[40 CFR 63 Subpart FFFF; 40 CFR 63.2450(e); 40 CFR 63 Subpart SS]
- a. Except for closed vent systems operated and maintained under negative pressure, the provisions of this paragraph apply to closed vent systems collecting regulated material from a regulated source.
[40 CFR 63.983(a)]
 - i. Each closed vent system shall be designed and operated to collect the regulated material vapors from the emission point, and to route the collected vapors to a control device.
[40 CFR 63.983(a)(1)]
 - ii. Closed vent systems shall be operated at all times when emissions are vented to, or collected by, them.
[40 CFR 63.983(a)(2)]
 - iii. Except for equipment needed for safety purposes such as pressure relief devices, low leg drains, high point bleeds, analyzer vents, and open-ended valves or lines, the Permittee shall comply with the provisions of either of the following paragraphs for each closed vent system that contains bypass lines that could divert a stream to the atmosphere. Beginning August 12, 2023, the exceptions for equipment needed for safety purposes such as pressure relief devices, low leg drains, high point bleeds, analyzer vents, and open-ended valves or lines no longer apply when demonstrating compliance with 40 CFR 63 Subpart SS.
[40 CFR 63.983(a)(3); 40 CFR 63.2450(e)(4)(i)]
 - (A) Properly install, maintain, and operate a flow indicator that is capable of taking periodic readings. Records shall be generated as specified in Condition 6.2.19.a.ii.A. The flow indicator shall be installed at the entrance to any bypass line.
[40 CFR 63.983(a)(3)(i)]

- (B) Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Records shall be generated as specified in Condition 6.2.19.a.ii.B.
[40 CFR 63.983(a)(3)(ii)]
 - iv. Each closed vent system collecting regulated material from a transfer rack shall be designed and operated so that regulated material vapors collected at one loading arm will not pass through another loading arm in the rack to the atmosphere.
[40 CFR 63.983(a)(4)]
 - v. For all transfer racks subject to the provisions of 40 CFR Subpart SS, the Permittee shall ensure that no pressure relief device in the transfer rack's closed vent system shall open to the atmosphere during loading. Prior to August 12, 2023, pressure relief devices needed for safety purposes are not subject to these requirements.
[40 CFR 63.983(a)(5) and 40 CFR 63.2450(e)(4)(ii)]
- b. The provisions of this paragraph apply to closed vent systems collecting regulated material from a regulated source. Inspection records shall be generated as specified in Conditions 6.2.19.a.iii. and a.iv.
[40 CFR 63.983(b)]
 - i. Except for any closed vent systems that are designated as unsafe or difficult to inspect as provided in paragraphs b.ii. and b.iii. of this condition, each closed vent system shall be inspected as specified in one of the following paragraphs.
[40 CFR 63.983(b)(1)]
 - (A) If the closed vent system is constructed of hard-piping, the Permittee shall conduct an initial inspection according to the procedures in Condition 4.2.3 and conduct annual inspections for visible, audible, or olfactory indications of leaks.
[40 CFR 63.983(b)(1)(i)]
 - (B) If the closed vent system is constructed of ductwork, Permittee shall conduct an initial and annual inspection according to the procedures in Condition 4.2.3.
[40 CFR 63.983(b)(1)(ii)]
 - ii. Any parts of the closed vent system that are designated, as described in Condition 6.2.19.a.i., as unsafe to inspect are exempt from the inspection requirements of paragraph b.i. of this condition if the conditions of the following paragraphs are met.
[40 CFR 63.983(b)(2)]

- (A) The Permittee determines that the equipment is unsafe-to-inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with paragraph b.i. of this condition; and
[40 CFR 63.983(b)(2)(i)]
 - (B) The Permittee has a written plan that requires inspection of the equipment as frequently as practical during safe-to-inspect times. Inspection is not required more than once annually.
[40 CFR 63.983(b)(2)(ii)]
- iii. Any parts of the closed vent system that are designated, as described in Condition 6.2.19.a.i., as difficult-to-inspect are exempt from the inspection requirements of paragraph b.i. of this condition if the provisions of the following paragraphs apply.
[40 CFR 63.983(b)(3)]
 - (A) The Permittee determines that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface; and
[40 CFR 63.983(b)(3)(i)]
 - (B) The Permittee has a written plan that requires inspection of the equipment at least once every 5 years.
[40 CFR 63.983(b)(3)(ii)]
- iv. For each bypass line, the Permittee shall comply with one of the following paragraphs.
[40 CFR 63.983(b)(4)]
 - (A) If a flow indicator is used, take a reading at least once every 15 minutes.
[40 CFR 63.983(b)(4)(i)]
 - (B) If the bypass line valve is secured in the non-diverting position, visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position, and the vent stream is not diverted through the bypass line.
[40 CFR 63.983(b)(4)(ii)]
- c. The provisions of this paragraph apply to closed vent systems collecting regulated material from a regulated source.
[40 CFR 63.983(d)]
 - i. If there are visible, audible, or olfactory indications of leaks at the time of the annual visual inspections required by paragraph b.i.A. of this condition, the Permittee shall eliminate the leak or monitor the equipment according to the procedures in Condition 4.2.3.
[40 CFR 63.983(d)(1)]

- ii. Leaks, as indicated by an instrument reading greater than 500 parts per million by volume above background or by visual inspections, shall be repaired as soon as practical, except as provided in paragraph c.iii. of this condition. Records shall be generated as specified in Condition 6.2.19.a.iii when a leak is detected.
[40 CFR 63.983(d)(2)]
 - (A) A first attempt at repair shall be made no later than 5 days after the leak is detected.
[40 CFR 63.983(d)(2)(i)]
 - (B) Except as provided in paragraph c.iii. of this condition, repairs shall be completed no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later.
[40 CFR 63.983(d)(2)(ii)]
- iii. Delay of repair of a closed vent system for which leaks have been detected is allowed if repair within 15 days after a leak is detected is technically infeasible or unsafe without a closed vent system shutdown, as defined in 40 CFR 63.981, or if the Permittee determines that emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed as soon as practical, but not later than the end of the next closed vent system shutdown.
[40 CFR 63.983(d)(3)]

40 CFR 63 Subpart UU for Equipment Leaks – General

- 3.3.24 The Permittee shall comply with the following general requirements for equipment subject to the provisions of 40 CFR 63 Subpart UU.
[40 CFR 63 Subpart UU; 40 CFR 63.1019]
- a. The provisions of 40 CFR 63 Subpart UU and the referencing subpart apply to equipment that contains or contacts regulated material. Subpart UU applies to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, and closed vent systems and control devices used to meet the requirements of Subpart UU. The provisions of 40 CFR Part 63, Subpart A (General Provisions) do not apply to Subpart UU except as noted in the referencing subpart.
[40 CFR 63.1019(a) and (b)]
 - b. Equipment in vacuum service is excluded from the requirements of 40 CFR 63 Subpart UU.
[40 CFR 63.1019(c)]
 - c. Equipment intended to be in regulated material service less than 300 hours per calendar year is excluded from the requirements of Conditions 3.3.29 through 3.3.35 if it is identified as required in Condition 3.3.25.b.iv.
[40 CFR 63.1019(d)]

- d. Lines and equipment not containing process fluids are not subject to the provisions of 40 CFR 63 Subpart UU. Utilities, and other non-process lines, such as heating and cooling systems that do not combine their materials with those in the processes they serve, are not considered to be part of a process unit or affected facility.
[40 CFR 63.1019(e)]
- e. For equipment subject to 40 CFR 60 Subpart VV for which the Permittee has elected to comply with 40 CFR 63 Subpart UU, the Permittee must consider all total organic compounds, minus methane and ethane, in such equipment for purposes of compliance with 40 CFR 63 Subpart UU as if they were organic HAP.
[40 CFR 63.2535(k)]
- f. For connectors in gas/vapor and light liquid service, the Permittee has elected to comply with the requirements of Condition 3.3.32 for connectors in heavy liquid service, including all associated recordkeeping and reporting requirements, as allowed by the provisions of 40 CFR 63.2480(b)(4) of 40 CFR 63 Subpart FFFF. Beginning August 12, 2023, this provision does not apply to connectors in gas/vapor and light liquid service that are subject to 40 CFR 60.482-11a of 40 CFR 60 Subpart VV, as applicable, in the Hard Resins Area.
[40 CFR 63.2480(b)(4); 40 CFR 63.2445(g)(7); and 40 CFR 63.2535(k)(1)]
- g. Beginning no later than August 12, 2021, the allowance to consider the leak definition that defines a leak to be 10,000 ppm or greater as an alternative to the values specified in 40 CFR 63.1026(b)(2) no longer applies.
[40 CFR 63.2480(b)(6)]
- h. For each piece of equipment that is subject to the equipment leak provisions of 40 CFR 63 Subpart UU as reference by 40 CFR 63 Subpart FFFF and is also subject to periodic monitoring with EPA Method 21 of 40 CFR Part 60, appendix A-7, and is added to an affected source after December 17, 2019, or replaces equipment at an affected source after December 17, 2019, the Permittee must initially monitor for leaks within 30 days after August 12, 2020, or initial startup of the equipment, whichever is later. Equipment that is designated as unsafe-or-difficult-to-monitor is not subject to this paragraph (h).
[40 CFR 63.2480(b)(7)]

40 CFR 63 Subpart UU for Equipment Leaks – Equipment Identification

- 3.3.25 The Permittee shall comply with the following requirements for equipment identification under the provisions of 40 CFR 63 Subpart UU.
[40 CFR 63 Subpart UU; 40 CFR 63.1022]
- a. Equipment subject to 40 CFR 63 Subpart UU shall be identified. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, by designation of

process unit or affected facility boundaries by some form of weatherproof identification, or by other appropriate methods.
[40 CFR 63.1022(a)]

- b. In addition to the general identification required by paragraph a. of this condition, equipment subject to any of the provisions in Conditions 3.3.26 through 3.3.35 shall be specifically identified as required in the following paragraphs, as applicable.
[40 CFR 63.1022(b)]
 - i. Except for inaccessible, ceramic, or ceramic-lined connectors and instrumentation systems identified pursuant to paragraph b.iii. of this condition, identify the connectors subject to the requirements of 40 CFR 63 Subpart UU. Connectors need not be individually identified if all connectors in a designated area or length of pipe subject to the provisions of 40 CFR 63 Subpart UU are identified as a group, and the number of connectors subject is indicated. With respect to connectors, the identification shall be complete no later than the completion of the initial survey required by paragraph a. of this condition.
[40 CFR 63.1022(b)(1)]
 - ii. Identify the pressure relief devices equipped with rupture disks, under the provisions of Condition 3.3.33.c.
[40 CFR 63.1022(b)(3)]
 - iii. Identify instrumentation systems. Individual components in an instrumentation system need not be identified.
[40 CFR 63.1022(b)(4)]
 - iv. The identity, either by list, location (area or group), or other method, of equipment in regulated material service less than 300 hours per calendar year within a process unit or affected facilities subject to the provisions of 40 CFR 63 Subpart UU shall be recorded.
[40 CFR 63.1022(b)(5)]
- c. The Permittee shall refer to the following paragraphs for valves, pumps, connectors, and agitators that are unsafe or difficult-to-monitor under 40 CFR 63 Subpart UU.
[40 CFR 63.1022(c)]
 - i. Valves meeting the provisions of Condition 3.3.29.d.i., pumps meeting the provisions of Condition 3.3.30.d.iv., and agitators meeting the provisions of Condition 3.3.31.c.v. may be designated unsafe-to-monitor if the Permittee determines that monitoring personnel would be exposed to an immediate danger as a consequence of complying with the monitoring requirements of this subpart. Examples of unsafe-to-monitor equipment include, but is not limited to, equipment under extreme pressure or heat.
[40 CFR 63.1022(c)(1)]
 - ii. Valves meeting the provisions of Condition 3.3.29.d.ii. may be designated difficult-to-monitor if the provisions of paragraph c.ii.A. apply. Agitators

meeting the provisions of Condition 3.3.31.c.iii. may be designated difficult-to-monitor if the provisions of paragraph c.ii.B. apply.
[40 CFR 63.1022(c)(2)]

(A) The Permittee determines that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters (7 feet) above a support surface or it is not accessible in a safe manner when it is in regulated material service and the process unit or affected facility within which the valve is located is an existing source, or the Permittee designates less than 3 percent of the total number of valves in a new source as difficult-to-monitor.

[40 CFR 63.1022(c)(2)(i)]

(B) The Permittee determines that the agitator cannot be monitored without elevating the monitoring personnel more than 2 meters (7 feet) above a support surface or it is not accessible in a safe manner when it is in regulated material service.

[40 CFR 63.1022(c)(2)(ii)]

iii. The Permittee shall record the identity of equipment designated as unsafe-to-monitor according to the provisions of paragraph c.i. of this condition and the planned schedule for monitoring this equipment. The Permittee shall record the identity of equipment designated as difficult-to-monitor according to the provisions of paragraph c.ii. of this condition, the planned schedule for monitoring this equipment, and an explanation why the equipment is unsafe or difficult-to-monitor. This record must be kept at the plant and be available for review by an inspector.

[40 CFR 63.1022(c)(3)]

iv. Equipment designated as unsafe-to-monitor according to the provisions of paragraph c.i. of this condition shall have a written plan that requires monitoring of the equipment as frequently as practical during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment according to the procedures in Condition 3.3.28 if a leak is detected.

[40 CFR 63.1022(c)(4)(i)]

v. Equipment designated as difficult-to-monitor according to the provisions of paragraph c.ii. of this condition shall have a written plan that requires monitoring of the equipment at least once per calendar year and repair of the equipment according to the procedures in Condition 3.3.28 if a leak is detected.

[40 CFR 63.1022(c)(4)(ii)]

d. The Permittee shall comply with the requirements of either paragraph d.i. or d.ii. of this condition, as provided in paragraph d.iii. of this condition for equipment in heavy liquid service.

[40 CFR 63 Subpart UU; 40 CFR 63.1022(f)]

- i. Retain information, data, and analyses used to determine that a piece of equipment is in heavy liquid service.
[40 CFR 63.1022(f)(1)]
- ii. When requested by the Division, demonstrate that the piece of equipment or process is in heavy liquid service.
[40 CFR 63.1022(f)(2)]
- iii. A determination or demonstration that a piece of equipment or process is in heavy liquid service shall include an analysis or demonstration that the process fluids do not meet the definition of “in light liquid service.” Examples of information that could document this include, but are not limited to, records of chemicals purchased for the process, analyses of process stream composition, engineering calculations, or process knowledge.
[40 CFR 63.1022(f)(3)]

40 CFR 63 Subpart UU for Equipment Leaks – Instrument and Sensory Monitoring for Leaks

- 3.3.26 The Permittee shall monitor regulated 40 CFR 63 Subpart UU equipment as specified in paragraph a. of this condition for instrument monitoring and paragraph b. of this condition for sensory monitoring.
[40 CFR 63 Subpart UU; 40 CFR 63.1023(a)]
- a. The Permittee shall conduct instrument monitoring for leaks as follows:
[40 CFR 63.1023(a)(1)]
 - i. Valves in gas and vapor service and in light liquid service shall be monitored pursuant to Condition 3.3.29.a.
[40 CFR 63.1023(a)(1)(i)]
 - ii. Pumps in light liquid service shall be monitored pursuant to Condition 3.3.30.a.
[40 CFR 63.1023(a)(1)(ii)]
 - iii. Agitators in gas and vapor service shall be monitored pursuant to Condition 3.3.31.a.
[40 CFR 63.1023(a)(1)(iv)]
 - iv. Pressure relief devices in gas and vapor service shall be monitored pursuant to Condition 3.3.33.b.
[40 CFR 63.1023(a)(1)(v)]
 - b. The Permittee shall conduct sensory monitoring for leaks as follows:
[40 CFR 63.1023(a)(2)]
 - i. Pumps in light liquid service shall be observed pursuant to Conditions 3.3.30.a.iv. and 3.3.30.d.i.E.
[40 CFR 63.1023(a)(2)(i)]

- ii. Agitators in gas and vapor service and in light liquid service shall be observed pursuant to Condition 3.3.31.a.iii. or 3.3.31.c.i.D.
[40 CFR 63.1023(a)(2)(iii)]

3.3.27 The Permittee shall comply with the following for leaking equipment identification and records under the provisions of 40 CFR 63 Subpart UU.
[40 CFR 63 Subpart UU; 40 CFR 63.1023(e)]

- a. When each leak is detected pursuant to the monitoring specified in Condition 3.3.26, a weatherproof and readily visible identification, shall be attached to the leaking equipment.
[40 CFR 63.1023(e)(1)]
- b. When each leak is detected, the information specified in Condition 3.3.28.d shall be recorded and kept pursuant to the referencing subpart.
[40 CFR 63.1023(e)(2)]

40 CFR 63 Subpart UU for Equipment Leaks – Leak Repair

3.3.28 The Permittee shall comply with the following requirements for leak repair under the provisions of 40 CFR 63 Subpart UU.
[40 CFR 63 Subpart UU; 40 CFR 63.1024]

- a. The Permittee shall repair each leak detected as soon as practical, but not later than 15 calendar days after it is detected, except as provided in paragraphs c. and d. of this condition. A first attempt at repair as defined in 40 CFR 63 Subpart UU shall be made no later than 5 calendar days after the leak is detected. First attempt at repair for pumps includes, but is not limited to, tightening the packing gland nuts and/or ensuring that the seal flush is operating at design pressure and temperature. First attempt at repair for valves includes, but is not limited to, tightening the bonnet bolts, and/or replacing the bonnet bolts, and/or tightening the packing gland nuts, and/or injecting lubricant into the lubricated packing.
[40 CFR 63.1024(a)]
- b. The Permittee shall comply with the following for leak identification removal:
[40 CFR 63.1024(c)]
 - i. The leak identification on a valve in gas/vapor or light liquid service may be removed after it has been monitored as specified in Condition 3.3.29.c.ii., and no leak has been detected during that monitoring.
[40 CFR 63.1024(c)(1)]
 - ii. The identification that has been placed, pursuant to Condition 3.3.27.a, on equipment determined to have a leak.
[40 CFR 63.1024(c)(2)]
- c. Delay of repair is allowed for any of the conditions specified in the following paragraphs. The Permittee shall maintain a record of the facts that explain any delay

of repairs and, where appropriate, why the repair was technically infeasible without a process unit shutdown.

[40 CFR 63.1024(d)]

- i. Delay of repair of equipment for which leaks have been detected is allowed if repair within 15 days after a leak is detected is technically infeasible without a process unit or affected facility shutdown. Repair of this equipment shall occur as soon as practical, but no later than the end of the next process unit or affected facility shutdown, except as provided in paragraph c.v. of this condition.

[40 CFR 63.1024(d)(1)]

- ii. Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in regulated material service.

[40 CFR 63.1024(d)(2)]

- iii. Delay of repair for valves, connectors, and agitators is also allowed if the provisions of the following paragraphs are met.

[40 CFR 63.1024(d)(3)]

- (A) The Permittee determines that emissions of purged material resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair, and

[40 CFR 63.1024(d)(3)(i)]

- (B) When repair procedures are affected, the purged material is collected and destroyed.

[40 CFR 63.1024(d)(3)(ii)]

- iv. Delay of repair for pumps is also allowed if the provisions of the following paragraphs are met.

[40 CFR 63.1024(d)(4)]

- (A) Repair requires replacing the existing seal design with a new system that the Permittee has determined under the provisions of 40 CFR 63.1035(d) (Quality Improvement Program for Pumps) will provide better performance or one of the specifications of the following paragraphs are met.

[40 CFR 63.1024(d)(4)(i)]

- (I) A dual mechanical seal system that meets the requirements of Condition 3.3.26.d.i. will be installed; or

[40 CFR 63.1024(d)(4)(i)(A)]

- (II) A pump that meets the requirements of Condition 3.3.30.d.ii. will be installed.

[40 CFR 63.1024(d)(4)(i)(B)]

- (B) Repair is completed as soon as practical, but not later than 6 months after the leak was detected.
[40 CFR 63.1024(d)(4)(ii)]
- v. Delay of repair beyond a process unit or affected facility shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit or affected facility shutdown, and valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the second process unit or affected facility shutdown will not be allowed unless the third process unit or affected facility shutdown occurs sooner than 6 months after the first process unit or affected facility shutdown.
[40 CFR 63.1024(d)(5)]
- d. For each leak detected, the information specified in the following paragraphs shall be recorded and maintained pursuant to the referencing subpart.
[40 CFR 63.1024(f)]
 - i. The date of first attempt to repair the leak.
[40 CFR 63.1024(f)(1)]
 - ii. The date of successful repair of the leak.
[40 CFR 63.1024(f)(2)]
 - iii. Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A at the time the leak is successfully repaired or determined to be nonrepairable.
[40 CFR 63.1024(f)(3)]
 - iv. "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak as specified in the following paragraphs:
[40 CFR 63.1024(f)(4)]
 - (A) The Permittee may develop a written procedure that identifies the conditions that justify a delay of repair. The written procedures may be included as part of the startup, shutdown, and malfunction plan, as required by the referencing subpart for the source, or may be part of a separate document that is maintained at the plant site. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure.
[40 CFR 63.1024(f)(4)(i)]
 - (B) If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.
[40 CFR 63.1024(f)(4)(ii)]

- v. Dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.
[40 CFR 63.1024(f)(5)]

40 CFR 63 Subpart UU for Equipment Leaks – Valves in Gas and Vapor Service and in Light Liquid Service Standards

3.3.29 The Permittee shall comply with the following requirements for valves in gas and vapor service and in light liquid service that are subject to the provisions of 40 CFR 63 Subpart UU:

[40 CFR 63 Subpart UU; 40 CFR 63.1025]

- a. Unless otherwise specified in 40 CFR 63.1021(b), paragraph d. of this condition, or the referencing subpart, the Permittee shall monitor all valves at the intervals specified in paragraphs a.iii. and/or a.iv. of this condition and shall comply with all other provisions of this condition.

[40 CFR 63.1025(b)]

- i. The valves shall be monitored to detect leaks by the method specified in Condition 4.2.4.a and, as applicable, Condition 4.2.4.b.

[40 CFR 63.1025(b)(1)]

- ii. The instrument reading that defines a leak is 500 parts per million or greater.

[40 CFR 63.1025(b)(2)]

- iii. The Permittee shall monitor valves for leaks at the intervals specified in paragraphs a.iii.A. through a.iii.E. of this condition and shall keep the record specified in paragraph a.iii.F. of this condition.

[40 CFR 63.1025(b)(3)]

- (A) If at least the greater of 2 valves or 2 percent of the valves in a process unit leak, as calculated according to paragraph b. of this condition, the Permittee shall monitor each valve once per month.

[40 CFR 63.1025(b)(3)(i)]

- (B) At process units with less than the greater of 2 leaking valves or 2 percent leaking valves, the Permittee shall monitor each valve once each quarter, except as provided in paragraphs a.iii.C. through a.iii.E. of this condition. Monitoring data generated before the regulated source became subject to the referencing subpart and meeting the criteria of either Condition 4.2.4.a.i. through a.v., or Condition 4.2.4.a.vi., may be used to qualify initially for less frequent monitoring under paragraphs a.iii.A. through a.iii.E. of this condition.

[40 CFR 63.1025(b)(3)(ii)]

- (C) At process units with less than 1 percent leaking valves, the Permittee may elect to monitor each valve once every two quarters

[40 CFR 63.1025(b)(3)(iii)]

- (D) At process units with less than 0.5 percent leaking valves, the Permittee may elect to monitor each valve once every four quarters.
[40 CFR 63.1025(b)(3)(iv)]
 - (E) At process units with less than 0.25 percent leaking valves, the Permittee may elect to monitor each valve once every 2 years.
[40 CFR 63.1025(b)(3)(v)]
 - (F) The Permittee shall keep a record of the monitoring schedule for each process unit.
[40 CFR 63.1025(b)(3)(vi)]
- iv. For a process unit or a group of process units to which 40 CFR 63 Subpart UU applies, the Permittee may choose to subdivide the valves in the applicable process unit or group of process units and apply the provisions of paragraph a.iii. of this condition to each subgroup. If the Permittee elects to subdivide the valves in the applicable process unit or group of process units, then the provisions of the following paragraphs apply.
[40 CFR 63.1025(b)(4)]
- (A) The overall performance of total valves in the applicable process unit or group of process units to be subdivided shall be less than 2 percent leaking valves, as detected according to paragraphs a.i. and a.ii. of this condition and as calculated according to paragraph b.ii. of this condition.
[40 CFR 63.1025(b)(4)(i)]
 - (B) The initial assignment or subsequent reassignment of valves to subgroups shall be governed by the provisions of the following paragraphs:
[40 CFR 63.1025(b)(4)(ii)]
 - (I) The Permittee shall determine which valves are assigned to each subgroup. Valves with less than one year of monitoring data or valves not monitored within the last twelve months must be placed initially into the most frequently monitored subgroup until at least one year of monitoring data have been obtained.
[40 CFR 63.1025(b)(4)(ii)(A)]
 - (II) Any valve or group of valves can be reassigned from a less frequently monitored subgroup to a more frequently monitored subgroup provided that the valves to be reassigned were monitored during the most recent monitoring period for the less frequently monitored subgroup. The monitoring results must be included with that less frequently monitored subgroup's associated percent leaking valves calculation for that monitoring event.
[40 CFR 63.1025(b)(4)(ii)(B)]
 - (III) Any valve or group of valves can be reassigned from a more frequently monitored subgroup to a less frequently monitored subgroup provided that the valves to be reassigned have not leaked for

the period of the less frequently monitored subgroup (e.g., for the last 12 months, if the valve or group of valves is to be reassigned to a subgroup being monitored annually). Nonrepairable valves may not be reassigned to a less frequently monitored subgroup.
[40 CFR 63.1025(b)(4)(ii)(C)]

- (C) The Permittee shall determine every 6 months if the overall performance of total valves in the applicable process unit or group of process units is less than 2 percent leaking valves and so indicate the performance in the next Periodic Report. If the overall performance of total valves in the applicable process unit or group of process units is 2 percent leaking valves or greater, the Permittee shall no longer subgroup and shall revert to the program required in paragraphs a.i. through a.iii. of this condition for that applicable process unit or group of process units. The Permittee can again elect to comply with the valve subgrouping procedures of paragraph a.iv. of this condition if future overall performance of total valves in the process unit or group of process units is again less than 2 percent. The overall performance of total valves in the applicable process unit or group of process units shall be calculated as a weighted average of the percent leaking valves of each subgroup according to Equation number 1 of 40 CFR 63.1025(b)(4)(iii).
[40 CFR 63.1025(b)(4)(iii)]

- (D) The Permittee shall maintain records specified in the following paragraphs:
[40 CFR 63.1025(b)(4)(iv)]

(I) Which valves are assigned to each subgroup,
[40 CFR 63.1025(b)(4)(iv)(A)]

(II) Monitoring results and calculations made for each subgroup for each monitoring period,
[40 CFR 63.1025(b)(4)(iv)(B)]

(III) Which valves are reassigned, the last monitoring result prior to reassignment, and when they were reassigned, and
[40 CFR 63.1025(b)(4)(iv)(C)]

(IV) The results of the semiannual overall performance calculation required in paragraph a.iv.C. of this condition.
[40 CFR 63.1025(b)(4)(iv)(D)]

- (E) The Permittee shall notify the Division no later than 30 days prior to the beginning of the next monitoring period of the decision to subgroup valves. The notification shall identify the participating process units and the number of valves assigned to each subgroup, if applicable, and may be included in the next Periodic Report.
[40 CFR 63.1025(b)(4)(v)]

- (F) The Permittee shall submit in the periodic reports the information specified in the following paragraphs.
[40 CFR 63.1025(b)(4)(vi)]
 - (I) Total number of valves in each subgroup, and
[40 CFR 63.1025(b)(4)(vi)(A)]
 - (II) Results of the semiannual overall performance calculation required by paragraph a.iv.C. of this condition.
[40 CFR 63.1025(b)(4)(vi)(B)]
 - (G) To determine the monitoring frequency for each subgroup, the calculation procedures of paragraph b.iii. of this condition shall be used.
[40 CFR 63.1025(b)(4)(vii)]
 - (H) Except for the overall performance calculations required by paragraphs a.iv.A. and a.iv.C. of this condition, each subgroup shall be treated as if it were a process unit for the purposes of applying the provisions of this condition.
[40 CFR 63.1025(b)(4)(viii)]
- b. The facility shall comply with the following for calculating percent leaking valves:
[40 CFR 63.1025(c)]
- i. The Permittee shall decide no later than the compliance date of 40 CFR 63 Subpart UU or upon revision of an operating permit whether to calculate percent leaking valves on a process unit or group of process units basis. Once the Permittee has decided, all subsequent percentage calculations shall be made on the same basis and this shall be the basis used for comparison with the subgrouping criteria specified in paragraph a.iv.A. of this condition.
[40 CFR 63.1025(c)(1)(i)]
 - ii. The percent leaking valves for each monitoring period for each process unit or valve subgroup, as provided in paragraph a.iv. of this condition, shall be calculated using Equation 2 in 40 CFR 63.1025(c)(1)(ii).
[40 CFR 63.1025(c)(1)(ii)]
 - iii. When determining monitoring frequency for each process unit or valve subgroup subject to monthly, quarterly, or semiannual monitoring frequencies, the percent leaking valves shall be the arithmetic average of the percent leaking valves from the last two monitoring periods. When determining monitoring frequency for each process unit or valve subgroup subject to annual or biennial (once every 2 years) monitoring frequencies, the percent leaking valves shall be the arithmetic average of the percent leaking valves from the last three monitoring periods.
[40 CFR 63.1025(c)(2)]

- iv. Nonrepairable valves shall be included in the calculation of percent leaking valves the first time the valve is identified as leaking and nonrepairable and as required to comply with paragraph b.v. of this condition. Otherwise, a number of nonrepairable valves (identified and included in the percent leaking valves calculation in a previous period) up to a maximum of 1 percent of the total number of valves in regulated material service at a process unit or affected facility may be excluded from calculation of percent leaking valves for subsequent monitoring periods.
[40 CFR 63.1025(c)(3)(i)]

- v. If the number of nonrepairable valves exceeds 1 percent of the total number of valves in regulated material service at a process unit or affected facility, the number of nonrepairable valves exceeding 1 percent of the total number of valves in regulated material service shall be included in the calculation of percent leaking valves.
[40 CFR 63.1025(c)(3)(ii)]

- c. The Permittee shall comply with the following for valve leak repair.
[40 CFR 63.1025(d)]
 - i. If a leak is determined pursuant to paragraph a., d.i., or d.ii. of this condition, then the leak shall be repaired using the procedures in Condition 3.3.28, as applicable.
[40 CFR 63.1025(d)(1)]

 - ii. After a leak has been repaired, the valve shall be monitored at least once within the first 3 months after its repair. The monitoring required by this paragraph is in addition to the monitoring required to satisfy the definition of repaired and first attempt at repair.
[40 CFR 63.1025(d)(2)]
 - (A) The monitoring shall be conducted as specified in Condition 4.2.4.a and Condition 4.2.4.b, as appropriate, to determine whether the valve has resumed leaking.
[40 CFR 63.1025(d)(2)(i)]

 - (B) Periodic monitoring required by paragraph a. of this condition may be used to satisfy the requirements of this paragraph, if the timing of the monitoring period coincides with the time specified in this paragraph. Alternatively, other monitoring may be performed to satisfy the requirements of this paragraph, regardless of whether the timing of the monitoring period for periodic monitoring coincides with the time specified in this paragraph.
[40 CFR 63.1025(d)(2)(ii)]

 - (C) If a leak is detected by monitoring that is conducted pursuant to this paragraph, the Permittee shall follow the provisions of the following

paragraphs, to determine whether that valve must be counted as a leaking valve for purposes of paragraph b.ii. of this condition.
[40 CFR 63.1025(d)(2)(iii)]

(I) If the Permittee elected to use periodic monitoring required by paragraph a. of this condition to satisfy the requirements of this paragraph, then the valve shall be counted as a leaking valve.
[40 CFR 63.1025(d)(2)(iii)(A)]

(II) If the Permittee elected to use other monitoring, prior to the periodic monitoring required by paragraph a. of this condition, to satisfy the requirements of this paragraph, then the valve shall be counted as a leaking valve unless it is repaired and shown by periodic monitoring not to be leaking.
[40 CFR 63.1025(d)(2)(iii)(B)]

d. The Permittee shall refer to the following paragraphs for special provisions for valves:
[40 CFR 63.1025(e)]

i. Any valve that is designated, as described in Condition 3.3.25.c.i., as an unsafe-to-monitor valve is exempt from the requirements of paragraphs a. and c.ii. of this condition and the Permittee shall monitor the valve according to the written plan specified in Condition 3.3.25.c.iv and c.v.
[40 CFR 63.1025(e)(1)]

ii. Any valve that is designated, as described in Condition 3.3.25.c.ii., as a difficult-to-monitor valve is exempt from the requirements of paragraph a. of this condition and the Permittee shall monitor the valve according to the written plan specified in Condition 3.3.25.c.iv. and c.v.
[40 CFR 63.1025(e)(2)]

iii. Any equipment located at a plant site with fewer than 250 valves in regulated material service is exempt from the requirements for monthly monitoring specified in paragraph a.iii.A. of this condition. Instead, the Permittee shall monitor each valve in regulated material service for leaks once each quarter, as provided in paragraphs d.i. and d.ii. of this condition.
[40 CFR 63.1025(e)(3)]

40 CFR 63 Subpart UU for Equipment Leaks – Pumps in Light Liquid Service Standards

3.3.30 The Permittee shall comply with the following for pumps in light liquid service that are subject to the provisions of 40 CFR 63 Subpart UU.
[40 CFR 63 Subpart UU; 40 CFR 63.1026]

a. Unless otherwise specified in paragraph d. of this condition, the Permittee shall monitor each pump to detect leaks and shall comply with all other provisions of this condition.

[40 CFR 63.1026(b)]

- i. The pumps shall be monitored monthly to detect leaks by the method specified in Condition 4.2.4.a, and, as applicable, Condition 4.2.4.b.
[40 CFR 63.1026(b)(1)]

- ii. The instrument reading that defines a leak is specified in the following paragraphs:
[40 CFR 63.1026(b)(2)]
 - (A) 5,000 parts per million or greater for pumps handling polymerizing monomers;
[40 CFR 63.1026(b)(2)(i)]

 - (B) 1,000 parts per million or greater for all other pumps.
[40 CFR 63.1026(b)(2)(iii)]

- iii. For pumps to which a 1,000 parts per million leak definition applies, repair is not required unless an instrument reading of 2,000 parts per million or greater is detected.
[40 CFR 63.1026(b)(3)]

- iv. Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. The Permittee shall document that the inspection was conducted and the date of the inspection. If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, the Permittee shall follow the procedure specified in either of the following paragraphs.
[40 CFR 63.1026(b)(4)]
 - (A) The Permittee shall monitor the pump as specified in Condition 4.2.4.a and, as applicable, Condition 4.2.4.b. If the instrument reading indicates a leak as specified in paragraph a.ii. of this condition, a leak is detected and it shall be repaired using the procedures in Condition 3.3.28, except as specified in paragraph a.iii. of this condition; or
[40 CFR 63.1026(b)(4)(i)]

 - (B) The Permittee shall eliminate the visual indications of liquids dripping.
[40 CFR 63.1026(b)(4)(ii)]

- b. The Permittee shall comply with the following for percent leaking pumps calculations.
[40 CFR 63.1026(c)]
 - i. The Permittee shall decide no later than the compliance date of this part or upon revision of this permit whether to calculate percent leaking pumps on a process unit basis or group of process units basis. Once the Permittee has decided, all subsequent percentage calculations shall be made on the same basis.

[40 CFR 63.1026(c)(1)]

- ii. If, when calculated on a 6-month rolling average, at least the greater of either 10 percent of the pumps in a process unit or three pumps in a process unit leak, the Permittee shall implement a quality improvement program for pumps that complies with the requirements of Condition 3.3.36.

[40 CFR 63.1026(c)(2)]

- iii. The number of pumps at a process unit or affected facility shall be the sum of all the pumps in regulated material service, except that pumps found leaking in a continuous process unit or affected facility within 1 month after start-up of the pump shall not count in the percent leaking pumps calculation for that one monitoring period only.

[40 CFR 63.1026(c)(3)]

- iv. Percent leaking pumps shall be determined by Equation 3 in 40 CFR 63.1026(c)(4).

[40 CFR 63.1026(c)(4)]

- c. If a leak is detected pursuant to paragraph a. of this condition, then the leak shall be repaired using the procedures in Condition 3.3.28, as applicable, unless otherwise specified in paragraph a.iv. of this condition for leaks identified by visual indications of liquids dripping.

[40 CFR 63.1026(d)]

- d. The Permittee shall refer to the following paragraphs for special provisions for pumps.

[40 CFR 63.1026(e)]

- i. Each pump equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of paragraph a. of this condition, provided the requirements specified in the following paragraphs are met.

[40 CFR 63.1026(e)(1)]

- (A) The Permittee determines, based on design considerations and operating experience, criteria applicable to the presence and frequency of drips and to the sensor that indicates failure of the seal system, the barrier fluid system, or both. The Permittee shall keep records at the plant of the design criteria and an explanation of the design criteria; and any changes to these criteria and the reasons for the changes. This record must be available for review by an inspector.

[40 CFR 63.1026(e)(1)(i)]

- (B) Each dual mechanical seal system shall be operated with the barrier fluid at a pressure that is at all times (except periods of startup, shutdown, or malfunction) greater than the pump stuffing box pressure; or equipped with a closed-loop system that purges the barrier fluid into a process stream.

[40 CFR 63.1026(e)(1)(ii)]

- (C) The barrier fluid is not in light liquid service.

[40 CFR 63.1026(e)(1)(iii)]

- (D) Each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both.

[40 CFR 63.1026(e)(1)(iv)]

- (E) Each pump is checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. The Permittee shall document that the inspection was conducted and the date of the inspection. If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, the Permittee shall follow the procedure specified in the following paragraphs prior to the next required inspection.

[40 CFR 63.1026(e)(1)(v)]

- (I) The Permittee shall monitor the pump as specified in Condition 4.2.4.a and, as applicable, 4.2.4.b, to determine if there is a leak of regulated material in the barrier fluid. If an instrument reading of 1,000 parts per million or greater is measured, a leak is detected and it shall be repaired using the procedures in Condition 3.3.28; or

[40 CFR 63.1026(e)(1)(v)(A)]

- (II) The Permittee shall eliminate the visual indications of liquids dripping.

[40 CFR 63.1026(e)(1)(v)(B)]

- (F) If indications of liquids dripping from the pump seal exceed the criteria established in paragraph d.i.A. of this condition, or if based on the criteria established in paragraph d.i.A. of this condition the sensor indicates failure of the seal system, the barrier fluid system, or both, a leak is detected.

[40 CFR 63.1026(e)(1)(vi)]

- (G) Each sensor as described in paragraph d.i.D. of this condition is observed daily or is equipped with an alarm unless the pump is located within the boundary of an unmanned plant site.

[40 CFR 63.1026(e)(1)(vii)]

- (H) When a leak is detected pursuant to paragraph d.i.F. of this condition, it shall be repaired as specified in Condition 3.3.28.

[40 CFR 63.1026(e)(1)(viii)]

- ii. Any pump that is designed with no externally actuated shaft penetrating the pump housing is exempt from the requirements of paragraph a. of this condition.

[40 CFR 63.1026(e)(2)]

- iii. If more than 90 percent of the pumps at a process unit or affected facility meet the criteria in either paragraph d.i. or d.ii. of this condition, the process unit or affected facility is exempt from the percent leaking calculation in paragraph b. of this condition.

[40 CFR 63.1026(e)(5)]

- iv. Any pump that is designated, as described in Condition 3.3.25.c.i., as an unsafe-to-monitor pump is exempt from the requirements of paragraph a. of this condition, the monitoring and inspection requirements of paragraphs d.i.E. through d.i.H. of this condition, and the Permittee shall monitor and inspect the pump according to the written plan specified in Condition 3.3.25.c.iv and c.v.

[40 CFR 63.1026(e)(6)]

40 CFR 63 Subpart UU for Equipment Leaks – Agitators in Gas and Vapor Service Standards

- 3.3.31 The Permittee shall comply with the following for agitators in gas and vapor service that are subject to the provisions of 40 CFR 63 Subpart UU.

[40 CFR 63 Subpart UU; 40 CFR 63.1028]

- a. The Permittee shall comply with the following paragraphs for leak detection:

[40 CFR 63.1028(c)]

- i. Each agitator seal shall be monitored monthly to detect leaks by the methods specified in Condition 4.2.4.a and, as applicable, Condition 4.2.4.b, except as provided in paragraph c. of this condition.

[40 CFR 63.1028(c)(1)]

- ii. If an instrument reading equivalent of 10,000 parts per million or greater is measured, a leak is detected.

[40 CFR 63.1028(c)(2)]

- iii. The Permittee shall comply with the following for visual inspection.

[40 CFR 63.1028(c)(3)]

- (A) Each agitator seal shall be checked by visual inspection each calendar week for indications of liquids dripping from the agitator seal. The Permittee shall document that the inspection was conducted and the date of the inspection.

[40 CFR 63.1028(c)(3)(i)]

- (B) If there are indications of liquids dripping from the agitator seal, the Permittee shall follow the procedures specified in the following paragraphs prior to the next required inspection.

[40 CFR 63.1028(c)(3)(ii)]

- (I) The Permittee shall monitor the agitator seal as specified in Condition 4.2.4.a and, as applicable Condition 4.2.4.b to determine if there is a leak of regulated material. If an instrument reading of 10,000 parts per million or greater is measured, a leak is detected, and it shall be repaired according to paragraph b. of this condition; or
[40 CFR 63.1028(c)(3)(ii)(A)]
 - (II) The Permittee shall eliminate the indications of liquids dripping from the agitator seal.
[40 CFR 63.1028(c)(3)(ii)(B)]
- b. If a leak is detected, then the leak shall be repaired using the procedures in Condition 3.3.28.
[40 CFR 63.1028(d)]
- c. The Permittee shall refer to the following paragraphs for special provisions for agitators.
[40 CFR 63.1028(e)]
 - i. Each agitator equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of paragraph a. of this condition, provided the requirements specified in following paragraphs are met.
[40 CFR 63.1028(e)(1)]
 - (A) Each dual mechanical seal system shall be operated with the barrier fluid at a pressure that is at all times (except during periods of startup, shutdown, or malfunction) greater than the agitator stuffing box pressure; or equipped with a closed-loop system that purges the barrier fluid into a process stream.
[40 CFR 63.1028(e)(1)(i)]
 - (B) The barrier fluid is not in light liquid service.
[40 CFR 63.1028(e)(1)(ii)]
 - (C) Each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both.
[40 CFR 63.1028(e)(1)(iii)]
 - (D) Each agitator seal is checked by visual inspection each calendar week for indications of liquids dripping from the agitator seal. If there are indications of liquids dripping from the agitator seal at the time of the weekly inspection, the Permittee shall follow the procedure specified in the following paragraphs prior to the next required inspection.
[40 CFR 63.1028(e)(1)(iv)]
 - (I) The Permittee shall monitor the agitator seal as specified in Condition 4.2.4.a and, as applicable, 4.2.4.b to determine the presence of regulated material in the barrier fluid. If an instrument reading

equivalent to or greater than 10,000 ppm is measured, a leak is detected and it shall be repaired using the procedures in Condition 3.3.28, or

[40 CFR 63.1028(e)(1)(iv)(A)]

(II) The Permittee shall eliminate the visual indications of liquids dripping.

[40 CFR 63.1028(e)(1)(iv)(B)]

(E) Each sensor as described in paragraph c.i.C. of this condition is observed daily or is equipped with an alarm unless the agitator seal is located within the boundary of an unmanned plant site.

[40 CFR 63.1028(e)(1)(v)]

(F) The Permittee of each dual mechanical seal system shall meet the requirements specified in the following paragraphs.

[40 CFR 63.1028(e)(1)(vi)]

(I) The Permittee shall determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both and applicable to the presence and frequency of drips. If indications of liquids dripping from the agitator seal exceed the criteria, or if, based on the criteria the sensor indicates failure of the seal system, the barrier fluid system, or both, a leak is detected and shall be repaired pursuant to Condition 3.3.28.

[40 CFR 63.1028(e)(1)(vi)(A)]

(II) The Permittee shall keep records of the design criteria and an explanation of the design criteria; and any changes to these criteria and the reasons for the changes.

[40 CFR 63.1028(e)(1)(vi)(B)]

ii. Any agitator that is designed with no externally actuated shaft penetrating the agitator housing is exempt from paragraph a. of this condition.

[40 CFR 63.1028(e)(2)]

iii. Any agitator seal that is designated, as described in Condition 3.3.25.c.ii., as a difficult-to-monitor agitator seal is exempt from the requirements of paragraph a. of this condition and the Permittee shall monitor the agitator seal according to the written plan specified in Condition 3.3.25.c.iv. and c.v.

[40 CFR 63.1028(e)(5)]

iv. Any agitator seal that is obstructed by equipment or piping that prevents access to the agitator by a monitor probe is exempt from the monitoring requirements of paragraph a. of this condition.

[40 CFR 63.1028(e)(6)]

- v. Any agitator seal that is designated, as described in Condition 3.3.25.c.i., as an unsafe-to-monitor agitator seal is exempt from the requirements of paragraph a. of this condition and the Permittee of the agitator seal monitors the agitator seal according to the written plan specified in Condition 3.3.25.c.iv. and c.v.
[40 CFR 63.1028(e)(7)]

40 CFR 63 Subpart UU for Equipment Leaks – Pumps, Valves, and Connectors in Heavy Liquid Service; Pressure Relief Devices in Liquid Service; and Instrumentation Systems Standards

3.3.32 The Permittee shall comply with the following for pumps, valves, and connectors in heavy liquid service; pressure relief devices in liquid service; and instrumentation systems that are subject to the provisions of 40 CFR 63 Subpart UU.
[40 CFR 63 Subpart UU; 40 CFR 63.1029]

- a. The Permittee shall comply with the following paragraph for leak detection.
[40 CFR 63 Subpart UU; 40 CFR 63.1029(b)]
 - i. Pumps, valves, and connectors in heavy liquid service; pressure relief devices in light liquid or heavy liquid service; and instrumentation systems shall be monitored within 5 calendar days by the method specified in Condition 4.2.4.a and, as applicable, Condition 4.2.4.b, if evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method, unless the potential leak is repaired as required in paragraph b. of this condition.
[40 CFR 63.1029(b)(1)]
 - ii. If an instrument reading of 10,000 parts per million or greater for agitators, 5,000 parts per million or greater for pumps handling polymerizing monomers, or 2,000 parts per million or greater for all other pumps, or 500 parts per million or greater for valves, connectors, instrumentation systems, and pressure relief devices is measured pursuant to paragraph a.i. of this condition, a leak is detected and shall be repaired pursuant to Condition 3.3.28, as applicable.
[40 CFR 63.1029(b)(2)]
- b. For equipment identified in paragraph (a) of this condition that is not monitored by the method specified in Condition 4.2.4.a and, as applicable, Condition 4.2.4.b, repaired shall mean that the visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated; that no bubbles are observed at potential leak sites during a leak check using soap solution; or that the system will hold a test pressure.
[40 CFR 63.1029(c)]

40 CFR 63 Subpart UU for Equipment Leaks – Pressure Relief Devices in Gas and Vapor Service Standards

3.3.33 The Permittee shall comply with the following for pressure relief devices in gas and vapor service that are subject to the provisions of 40 CFR 63 Subpart UU.

[40 CFR 63 Subpart UU; 40 CFR 63.1030]

- a. Except during pressure releases as provided for in paragraph b. of this condition, or as otherwise specified in paragraph c. of this condition, each pressure relief device in gas and vapor service shall be operated with an instrument reading of less than 500 parts per million as measured by the method specified in Condition 4.2.4.a and, as applicable, Condition 4.2.4.b.
[40 CFR 63.1030(b)]

- b. The Permittee shall comply with the following after pressure releases occur.
[40 CFR 63.1030(c)]
 - i. After each pressure release, the pressure relief device shall be returned to a condition indicated by an instrument reading of less than 500 parts per million, as soon as practical, but no later than 5 calendar days after each pressure release, except as provided in Condition 3.3.28.c.
[40 CFR 63.1030(c)(1)]

 - ii. The pressure relief device shall be monitored no later than five calendar days after the pressure to confirm the condition indicated by an instrument reading of less than 500 parts per million above background, as measured by the method specified in Condition 4.2.4.a and, as applicable, Condition 4.2.4.b.
[40 CFR 63.1030(c)(2)]

 - iii. The Permittee shall record the dates and results of the monitoring required by paragraph b.ii. of this condition following a pressure release including the background level measured and the maximum instrument reading measured during the monitoring.
[40 CFR 63.1030(c)(3)]

- c. Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the requirements of paragraphs a. and b. of this condition provided the Permittee installs a replacement rupture disk upstream of the pressure relief device as soon as practical after each pressure release but no later than 5 calendar days after each pressure release, except as provided in Condition 3.3.24.c.
[40 CFR 63.1030(e)]

- d. Beginning no later than August 12, 2023, except as specified in paragraph (d)(iv) of this condition, the Permittee must comply with the requirements specified in paragraphs (d)(i) and (ii) below for pressure relief devices, such as relief valves or rupture disks in organic HAP gas or vapor service instead of the pressure relief device requirements of paragraphs (a) through (c) of this condition. Except as specified in paragraphs (d)(iv) and (v) below, the Permittee must comply with the requirements specified in paragraphs (d)(iii), (vi), (vii), and (viii) below for all pressure relief devices in organic HAP service.
[40 CFR 63.2480(e)]

- i. Except during a pressure release, operate each pressure relief device in organic HAP gas or vapor service with an instrument reading of less than 500 ppm above background as measured by the method specified in Condition 4.2.4.a.
- ii. For pressure relief devices in organic HAP gas or vapor service, the Permittee must comply with the following paragraphs (d)(ii)(A) through (C) below following a pressure release.
 - (A) If the pressure release does not consist of or include a rupture disk, conduct instrument monitoring, as specified in Condition 4.2.4.a no later than 5 calendar days after the pressure relief device returns to organic HAP gas or vapor service following a pressure release to verify that the pressure relief devices is operating with an instrument reading of less than 500 ppm.
 - (B) If the pressure relief device includes a rupture disk, either comply with the requirements in paragraph (d)(ii)(A) of this condition (and do not replace the rupture disk) or install a replacement disk as soon as practicable after a pressure release, but no later than 5 calendar days after the pressure release. The Permittee must conduct instrument monitoring no later than 5 calendar days after the pressure relief device returns to organic HAP gas or vapor service following a pressure release to verify that the pressure relief device is operating with an instrument reading of less than 500 ppm.
 - (C) If the pressure relief device consists only of a rupture disk, install a replacement disk as soon as practicable after a pressure release, but no later than 5 calendar days after the pressure release. The Permittee must not initiate startup of the equipment served by the rupture disk until the rupture disc is replaced. The Permittee must conduct instrument monitoring no later than 5 calendar days after the pressure relief device returns to organic HAP gas or vapor service following a pressure release to verify that the pressure relief device is operating with an instrument reading of less than 500 ppm.
- iii. Except as specified in paragraphs (iv) and (v) of this condition, the Permittee must comply with the requirements specified in (d)(iii)(A) through (E) below for all pressure relief devices in organic HAP service.
 - (A) The Permittee must equip each affected pressure relief device with a device(s) or use a monitoring system that is capable of:
 - (I) Identifying the pressure release;
 - (II) Recording the time and duration of each pressure release; and
 - (III) Notifying operators immediately that a pressure release is occurring. The device or monitoring system must be either specific to the pressure relief device itself or must be associated with the process

system or piping, sufficient to indicate a pressure release to the atmosphere. Examples of these types of devices and systems include, but are not limited to, a rupture disk indicator, magnetic sensor, motion detector on the pressure relief valve stem, flow monitor, or pressure monitor.

- (B) The Permittee must apply at least three redundant prevention measures to each affected pressure relief device and document these measures. Examples of prevention measures include:
- (I) Flow, temperature, liquid level and pressure indicators with deadman switches, monitors, or automatic actuators. Independent, non-duplicative systems within this category count as separate redundant prevention measures.
 - (II) Documented routine inspection and maintenance programs and/or operator training (maintenance programs and operator training may count as only one redundant prevention measure).
 - (III) Inherently safer designs or safety instrumentation systems.
 - (IV) Deluge systems.
 - (V) Staged relief system where the initial pressure relief device (with lower set release pressure) discharges to a flare or other closed vent system and control device.
- (C) If any affected pressure relief device releases to the atmosphere as a result of a pressure release event, the Permittee must perform root cause analysis and corrective action analysis according to the requirement of paragraph (vi) of this condition and implement corrective actions according to the requirements in paragraph (vii) of this condition. The Permittee must calculate the quantity of organic HAP released during each pressure release event and report this quantity as required in 40 CFR 63.2520(e)(15) and Condition 6.2.12.1. Calculations may be based on data from the pressure relief device monitoring alone or in combination with process parameter monitoring data and process knowledge.
- (D) The Permittee must determine the total number of release events that occurred during the calendar year for each affected relief device separately. The Permittee must also determine the total number of release events for each pressure relief device for each pressure relief device for which the root cause analysis concluded that the root cause was a *force majeure* event, as defined in 40 CFR 63.2550.

- (E) Except for pressure relief devices described in paragraphs (iv) and (v) of this Condition, the following release events from an affected pressure relief device are a deviation of the pressure release management work practice standards.
 - (I) Any release event for which the root cause of the event was determined to be operator error or poor maintenance.
 - (II) A second release event not including *force majeure* events from a single pressure relief device in a 3 calendar year period for the same root cause for the same equipment.
 - (III) A third release event not including *force majeure* events from a single pressure relief device in a 3 calendar year period for any reason.
- iv. For pressure relief devices routed to a control device, process, fuel gas system, or drain system:
 - (A) If all releases and potential leaks from a pressure relief device are routed through a closed vent system to a control device, back into the process, to the fuel gas system, or to a drain system, then the Permittee is not required to comply with paragraphs (d)(i), (ii), or (iii) of this condition.
 - (B) Before August 12, 2023, both the closed vent system and control device (if applicable) referenced in paragraph (d)(6)(iv)(A) of this condition must meet the applicable requirements specified in 40 CFR 63.982(b) and (c)(2) of 40 CFR 63 Subpart SS.
Beginning August 12, 2023, both the closed vent system and control device (if applicable) referenced in (6)(iv)(A) of this condition must meet the applicable requirements specified in 40 CFR 63.982(c)(2), 40 CFR 63.983, and 40 CFR 63.2450(e)(4) through (6).
 - (C) The drain system (if applicable) referenced in paragraph (d)(6)(iv)(A) of this condition must meet the applicable requirements specified in 40 CFR 63.2485(e) and Condition 3.3.15.
- v. The following types of pressure relief devices are not subject to the pressure release management requirements in paragraph (d)(6)(iii) of this condition.
 - (A) Pressure relief devices in heavy liquid service, as defined in 40 CFR 63.1020 of 40 CFR 63 Subpart UU.
 - (B) Thermal expansion relief valves.
 - (C) Pressure relief devices on mobile equipment.

- (D) Pilot-operated pressure relief devices where the primary release valve is routed through a closed vent system to a control device or back into the process, to the fuel gas system, or to a drain system. Note: prohibitions for the installation of pilot-operated pressure relief devices are specified in 40 CFR 63.2480(e)(8).
- vi. A root cause analysis and corrective action analysis must be completed as soon as possible, but no later than 45 days after a release event. Special circumstances affecting the number of root cause analyses and/or corrective action analyses are provided in 40 CFR 63.2480(e)(6)(i) through (iii).
- vii. The Permittee must implement the corrective action(s) identified in the corrective action analysis in accordance with paragraphs (d)(vii)(A) through (C) below:
 - (A) All corrective action(s) must be implemented within 45 days of the event for which the root cause and corrective action analyses were required or as soon thereafter as practicable. If the Permittee concludes that no corrective action should be implemented, the Permittee must record and explain the basis for that conclusion no later than 45 days following the event.
 - (B) For corrective actions that cannot be fully implemented within 45 days of the event for which the root cause and corrective action analysis were required, you must develop an implementation schedule to complete the corrective action(s) as soon as practicable.
 - (C) No later than 45 days following the event for which a root cause and corrective action analyses were required, the Permittee must record the corrective action(s) completed to date, and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates.

40 CFR 63 Subpart UU for Equipment Leaks – Sampling Connection Systems Standards

- 3.3.34 The Permittee shall comply with the following for sampling connection systems that are subject to the provisions of 40 CFR 63 Subpart UU.
[40 CFR 63 Subpart UU; 40 CFR 63.1032]
- a. Each sampling connection system shall be equipped with a closed-purge or closed-loop system, except as provided in paragraph c. of this condition. Gases displaced during filling of the sample container are not required to be collected or captured.
[40 CFR 63.1032(b)]
 - b. Each closed-purge or closed-loop system as required in paragraph a. of this condition shall meet the applicable requirements specified in the following paragraphs.
[40 CFR 63.1032(c)]

- i. The system shall return the purged process fluid directly to a process line; or
[40 CFR 63.1032(c)(1)]
- iii. Collect, store, and transport the purged process fluid to a system or facility identified in the following paragraphs.
[40 CFR 63.1032(c)(4)]
 - (A) A waste management unit as defined in 40 CFR 63.111 or 40 CFR 63 Subpart G, if the waste management unit is subject to and operating in compliance with the provisions of 40 CFR 63 Subpart G, applicable to Group 1 wastewater streams. If the purged process fluid does not contain any regulated material listed in Table 9 of 40 CFR 63 Subpart G, the waste management unit need not be subject to, and operated in compliance with the requirements of 40 CFR 63 Subpart G, applicable to Group 1 wastewater streams provided the facility has a NPDES permit or sends the wastewater to an NPDES-permitted facility.
[40 CFR 63.1032(c)(4)(i)]
 - (B) A treatment, storage, or disposal facility subject to regulation under 40 CFR parts 262, 264, 265, or 266; or
[40 CFR 63.1032(c)(4)(ii)]
 - (C) A facility permitted, licensed, or registered by a State to manage municipal or industrial solid waste, if the process fluids are not hazardous waste as defined in 40 CFR part 261.
[40 CFR 63.1032(c)(4)(iii)]
- iii. Containers that are part of a closed purge system must be covered or closed when not being filled or emptied.
[40 CFR 63.1032(c)(5)]
- c. In-situ sampling systems and sampling systems without purges are exempt from the requirements of paragraphs a. and b. of this condition.
[40 CFR 63.1032(d)]

40 CFR 63 Subpart UU for Equipment Leaks – Open-Ended Valves or Lines Standards

- 3.3.35 The Permittee shall comply with the following for open-ended valves or lines that are subject to the provisions of 40 CFR 63 Subpart UU.
[40 CFR 63 Subpart UU; 40 CFR 63.1033]
- a. Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in paragraphs d. and e. of this condition. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance. The operational provisions of paragraphs b. and c. of this condition also apply.
[40 CFR 63.1033(b)(1)]

- b. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
[40 CFR 63.1033(b)(2)]
- c. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with paragraph a. of this condition at all other times.
[40 CFR 63.1033(b)(3)]
- d. Open-ended valves or lines in an emergency shutdown system that are designed to open automatically in the event of a process upset are exempt from the requirements of paragraphs a. through c. of this condition.
[40 CFR 63.1033(c)]
- e. Open-ended valves or lines containing materials that would autocatalytically polymerize or, would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in paragraphs a. through c. of this condition are exempt from the requirements of paragraphs a. through c. of this condition.
[40 CFR 63.1033(d)]

40 CFR 63 Subpart UU for Equipment Leaks – Quality Improvement Programs for Pumps

- 3.3.36 If, on a 6-month rolling average, at least the greater of either 10 percent of the pumps in a process unit or affected facility (or plant site) or three pumps in a process unit or affected facility (or plant site) leak, the Permittee shall comply with the provisions of 40 CFR 63.1035.
[40 CFR 63 Subpart UU; 40 CFR 63.1035]

40 CFR 63 Subpart DDDDD

- 3.3.37 The Permittee shall comply with all applicable provisions of 40 CFR 63 Subpart DDDDD, “National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters,” and the applicable provisions of 40 CFR 63 Subpart A, “General Provisions,” as specified in Table 10 to 40 CFR 63 Subpart DDDDD for the operation of the No. 9 Boiler (Source Code P009) and the No. 10 Boiler (Source Code P010).
[40 CFR 63 Subparts A and DDDDD]
- 3.3.38 The Permittee shall not discharge or cause the discharge into the atmosphere from No. 9 Boiler (Source Code P009) any gases which:
- a. Contain hydrogen chloride (HCl) emissions in excess of 0.022 pounds per million Btu, excluding periods of startup and shutdown.
[40 CFR 63.7500 and Table 2, Line 1.a. of 40 CFR 63 Subpart DDDDD]

- b. Contain mercury (Hg) emissions in excess of 5.7×10^{-6} pounds per million Btu, excluding periods of startup and shutdown.
[40 CFR 63.7500 and Table 2, Line 1.b. of 40 CFR 63 Subpart DDDDD]
 - c. Contain carbon monoxide (CO) emissions in excess of 3,500 part per million (ppm) by volume on a dry basis corrected to 3 percent oxygen, 3-run average, excluding periods of startup and shutdown.
[40 CFR 63.7500 and Table 2, Line 13.a. of 40 CFR 63 Subpart DDDDD]
 - d. Contain filterable particulate matter (PM) emissions in excess of 0.44 pounds per million Btu, excluding periods of startup and shutdown.
[40 CFR 63.7500 and Table 2, Line 13.b. of 40 CFR 63 Subpart DDDDD]
- 3.3.39 The Permittee shall comply with the startup and shutdown requirements in Table 3 of 40 CFR 63 Subpart DDDDD for the No. 9 Boiler (Source Code P009) and the No. 10 Boiler (Source Code P010).
[40 CFR 63.7500 and Table 3, Line 5 of 40 CFR 63 Subpart DDDDD]
- 3.3.40 For the purposes of 40 CFR 63 Subpart DDDDD, the No. 10 Boiler (Source Code P010) is designated as an existing industrial boiler in the “units designed to burn gas 1” subcategory and is not subject to emission or operating limits under this subpart.
[40 CFR 63.7500(e)]
- 3.3.41 For each CMS required for 40 CFR 63 Subpart DDDDD, the Permittee must develop, and submit to the Director for approval upon request, a site-specific monitoring plan that addresses the design, data collection, and the quality assurance and quality control elements outlined in 40 CFR 63.8(d) and the elements of 40 CFR 63.7505(d) (1-4). The Permittee must conduct a performance evaluation of each CMS in accordance with the site-specific monitoring plan. Each CMS must be maintained and continuously operated according to the site-specific monitoring plan.
[40 CFR 63.7505(d)]
- 3.3.42 If the Permittee chooses to comply with the requirements of 40 CFR 63 Subpart DDDDD using definition (2) of “startup” in 40 CFR 63.7575, a written startup and shutdown plan (SSP) must be developed and implemented according to the requirements of Table 3 of Subpart DDDDD. The SSP must be maintained onsite and available upon request for public inspection.
[40 CFR 63.7505(e)]

3.4 Equipment SIP Rule Standards

- 3.4.1 The Permittee shall not cause, let, suffer, permit or allow emissions of any gases from the equipment listed in Table 3.4.1, which exhibit forty percent (40%) opacity, or greater.
[391-3-1-.02(2)(b)]

Table 3.4.1: Equipment subject to Georgia Rule (b)

Source Code	Description
<u>STAYBELITE/FORAL AREA</u>	
SAG1	Staybelite (4) & Foral (4) Resin Reactors
SA04	Staybelite Still
SA05	Staybelite Thermal Transfer Fluid System
<u>HARD RESINS AREA</u>	
HRG1	Hard Resins Kettles A – F
HRG2	Hard Resins Hoppers & Bagging
HRG3	Hard Resins Belt Molten Feed
<u>TERPENE RESINS AREA</u>	
TR02	Terpene Resins Reactors R-5 & R-6
TR03	Terpene Resins Dechlorinators R-19A & R-19B
TR04	Terpene Resins Lochem Filter
TR07	Terpene Resins LTC Evaporation System (including Evaporator, Still Column & Stripper Column)
<u>LIQUID RESINS/SCP</u>	
SP01	SCP Reactor R-403
LRG1	Liquid Resins Stills & Towers (LR1A-D)
<u>DISTILLATION AND CHEMICAL PLANT</u>	
CPG1	Chemical Plant Reactors RP-1 through RP-3
SHG1	Still House Batch Stills (17, 25, 27, 29, & 31)
S021	Continuous Still No. 21

- 3.4.2 The Permittee shall not cause, let, permit, suffer, or allow the rate of emission from the equipment listed in Table 3.4.2, particulate matter in total quantities equal to or exceeding the allowable rates calculated using the following equations:
[391-3-1-.02(2)(e)]

$E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour.

$E = 55P^{0.11} - 40$; for process input weight rate above 30 tons per hour.

E = emission rate in pounds per hour

P = process input weight rate in tons per hour

Table 3.4.2: Equipment subject to Georgia Rule (e)

Source Code	Description
<u>PRIMARY PROCESSING</u>	
MG01	Millroom Operations (M001-8, MF02-7)
CT01	Primary Area Cooling Tower
<u>EXTRACTION/REFINERY</u>	
EAG1	Spent Wood Conveyors
EBG1	Old Extractor Group (EB01-EB04)
EXG1	Crown Extractor, Desolventizer, Pre-Evaporator System, and Feed Hopper
<u>PEXITE PLANT</u>	
PXG1	Resin Refining (PX01-PX04)
<u>VINSOL AREA</u>	
VG01	Vinsol Bagging
VF04	Vinsol Group (V007, V008, VF01-VF03)
<u>STAYBELITE/FORAL AREA</u>	
SAG1	Staybelite (4) & Foral (4) Resin Reactors
SA04	Staybelite Still
SA05	Staybelite Thermal Transfer Fluid System
<u>HARD RESINS AREA</u>	
HRG3	Hard Resins Belt Molten Feed
HRG1	Hard Resins Kettles A – F
HRG2	Hard Resins Hoppers & Bagging
<u>TERPENE RESINS AREA</u>	
TR02	Terpene Resins Reactors R-5 & R-6
TR03	Terpene Resins Dechlorinators R-19A & R-19B
TR04	Terpene Resins Lochem Filter
TR07	Terpene Resins LTC Evaporation System (including Evaporator, Still Column & Stripper Column)
<u>LIQUID RESINS/SCP</u>	
SP01	SCP Reactor R-403
LRG1	Liquid Resins Stills & Towers (LR1A-D)
<u>DISTILLATION AND CHEMICAL PLANT</u>	
CPG1	Chemical Plant Reactors RP-1 through RP-3
SHG1	Still House Batch Stills (25, 27 & 29)
S021	Continuous Still No. 21

- 3.4.3 The Permittee shall not cause, let, permit, suffer, or allow the discharge from the Primary Processing area emissions which exhibit 20% opacity, or greater.
[391-3-1-.02(2)(n)]

Table 3.4.3: Primary Processing Equipment subject to Georgia Rule (n)

Source Code	Description
MG01	Millroom Operations (M001-8, MF02-7)
EBG1	Old Extractor Group (EB01-EB04)
EAG1	Spent Wood Conveyors

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Pinova, Inc.

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PXG1	Resin Refining (PX01-PX04)
VG01	Vinsol Bagging
VF04	Vinsol Group (V007, V008, VF01-VF03)
EXG1	Crown Extractor, Desolvenizer, Pre-Evaporator System and Feed Hopper
CT01	Primary Area Cooling Tower

- 3.4.4 The Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in the Liquid Resins Xceltherm Vaporizer (Source Code LR02).
[391-3-1-.02(2)(g)]
- 3.4.5 The Permittee shall not cause, let, suffer, permit, or allow the emissions of fly ash and/or other particulate matter from the Terpene Resins Hot Oil Heater (Source Code TR08), the SCP Resins Dowtherm Boiler (Source Code SP06) or the Liquid Resins Xceltherm Vaporizer (Source Code LR02) in amounts equal to or exceeding 0.5 pounds per million BTU heat input.
[391-3-1-.02(2)(d)2(i)]
- 3.4.6 The Permittee shall not cause, let, permit, suffer, or allow the discharge from the Sawdust Handling (Source Code PFG1) areas emissions which exhibit 20% opacity, or greater.
[391-3-1-.02(2)(n)]
- 3.4.7 The Permittee shall not cause, let, suffer, permit, or allow the emissions of fly ash and/or other particulate matter from the No. 10 Boiler (Source Code P010) in amounts equal to or exceeding the rate derived from $P=0.5(10/R)^{0.5}$ pounds per million BTU heat input where P equals the allowable weight of emissions of fly ash and/or particulate matter in pounds per million BTU heat input and R equals heat input of fuel-burning equipment in million BTU per hour.
[391-3-1-.02(2)(d)2(ii)]
- 3.4.8 The Permittee shall not cause, let, suffer, permit, or allow the emissions of fly ash and/or other particulate matter from the No. 9 Boiler (Source Code P009) in amounts greater than 0.10 pounds per million BTU heat input.
[391-3-1-.02(2)(d)2(iii)]
- 3.4.9 The Permittee shall not cause, let, suffer, permit or allow emissions from the No. 9 Boiler (Source Code P009), the Terpene Resins Hot Oil Heater (Source Code TR08), the SCP Resins Dowtherm Boiler (Source Code SP06) or the Liquid Resins Therminol Vaporizer (Source Code LR02) which exhibit 20% opacity or greater, except for one six-minute period of not more than 27% opacity per hour.
[391-3-1-.02(2)(d)3]
- 3.4.10 The Permittee shall not burn fuel containing more than 3 percent sulfur, by weight, in the No. 9 Boiler (Source Code P009).
[391-3-1-.02(2)(g)]

- 3.4.11 The Permittee shall not cause, let, suffer, permit or allow sulfur dioxide emissions from the No. 9 Boiler (Source Code P009) greater than 0.8 pounds per million BTU heat input.
[391-3-1-.02(2)(g)1(i)]
- 3.4.12 The Permittee shall not cause, let, suffer, permit, or allow emissions from the No. 10 Boiler (Source Code P010) which exhibit 20% opacity or greater, except for one six-minute period of not more than 27% opacity per hour.
[391-3-1-.02(2)(d)(3)]

3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

General

- 3.5.1 The Permittee shall maintain an inventory of filter bags such that an adequate supply of bags are on hand to replace any defective bags in each baghouse.
[391-3-1-.02(2)(a)(2)]

Terpene Resins Area

- 3.5.2 The Permittee shall not combust fuel oil in the Terpene Resins Hot Oil Heater (Source Code TR08) containing sulfur greater than 1.0 percent by weight.
[391-3-1-.02(2)(a)(3), 391-3-1-.02(2)(g) subsumed]

Hard Resins Area

- 3.5.3 The Permittee shall operate the Hard Resins Thermal Oxidizer (Source Code HRT0) during any period when the Hard Resins Process is in operation.
[391-3-1-.02(2)(a)(2)]

Specialty Chemical Processing (SCP)

- 3.5.4 The Permittee shall not combust fuel oil in the SCP Resins Dowtherm Boiler (Source Code SP06) containing sulfur greater than 0.5 percent by weight.
[391-3-1-.02(2)(a)(3), 391-3-1-.02(2)(g) subsumed]

Power Plant Operations

- 3.5.5 The following may be combusted in the No. 9 Boiler (Source Code P009):
[391-3-1-.02(a)3, 40 CFR 63 Subpart DDDDD]
- Wood waste, including wood chips, sawdust and bark. The biomass fuel combusted must exceed a moisture content of 40 percent on an as-fired annual heat input basis.
 - No. 2 fuel oil; and
 - Non-hazardous raw materials, co-product, by products or products with significant BTU value and sulfur content below 3 %.

PART 4.0 REQUIREMENTS FOR TESTING**4.1 General Testing Requirements**

- 4.1.1 The Permittee shall cause to be conducted a performance test at any specified emission unit when so directed by the Environmental Protection Division (“Division”). The test results shall be submitted to the Division within 60 days of the completion of the testing. Any tests shall be performed and conducted using methods and procedures that have been previously specified or approved by the Division.
[391-3-1-.02(6)(b)1(i)]
- 4.1.2 The Permittee shall provide the Division thirty (30) days (or sixty (60) days for tests required by 40 CFR Part 63) prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
[391-3-1-.02(3)(a) and 40 CFR 63.7(b)(1)]
- 4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division’s Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 are as follows:
- a. Method 1 for sample point location,
 - b. Method 2 for the determination of flow rate,
 - c. Method 3 for the determination of stack gas molecular weight,
 - d. Method 4 for the determination of stack gas moisture,
 - e. Method 5 and 5B, Method 17, and Method 202, as applicable, for the determination of particulate matter,
 - f. Method 9 and the Procedures of Section 1.3 for the determination of the opacity of visual emissions,
 - g. Method 10 for determination of carbon monoxide emissions from stationary sources
 - h. Method 15 for the determination of hydrogen sulfide, carbonyl sulfide, and carbon disulfide emissions,
 - i. Method 16 for the determination of the concentration of total reduced sulfur,
 - j. Method 18 for the determination of gaseous organic compound emissions,

- k. Method 19 for the determination of emission rates of nitrogen oxides, sulfur dioxide, and carbon monoxide. Method 19 shall be used, when applicable, to convert particulate matter, carbon monoxide, sulfur dioxide, and nitrogen oxides concentrations (i.e. grains/dscf for PM, ppm for gaseous pollutants), as determined using other methods specified in this section, to emission rates (i.e. lb/MMBtu),
- l. Method 21 for the determination of volatile organic compound leaks,
- m. Method 25 for the determination of total Gaseous Nonmethane Organic Emissions as Carbon,
- n. Method 26A for the determination of hydrogen-halide and halogen emissions,
- o. Method 308 for the determination of methanol emissions from stationary sources,
- p. Method 0011 for the determination of aldehydes and ketones,
- q. ASTM 396-86 Standard Specification for Fuel Oils,
- r. Method 320 - Vapor Phase Organic & Inorganic Emissions by Extractive FTIR.
- s. Method 7 or 7E for the determination of NO_x emissions,
- t. Method 29, 30A, 30B, or 101A for the determination of mercury emissions.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

- 4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard.

[391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

4.2 Specific Testing Requirements

- 4.2.1 The Permittee shall conduct annual performance tests for the following specified equipment and pollutants:

[Georgia Rule 391-3-1-.02(6)(b)1(i)]

Source Code	Equipment	Pollutant
P009	No. 9 Boiler	Opacity

40 CFR 63 Subpart FFFF

- 4.2.2 The Permittee shall complete any initial compliance demonstrations required by the provisions of 40 CFR 63.2445(d) and (e).
[40 CFR 63 Subpart FFFF; 40 CFR 63.2445]
- a. If the Permittee has a Group 2 emission point that becomes a Group 1 emission point after the compliance date for the affected 40 CFR 63 Subpart FFFF source, the Permittee must comply with the Group 1 requirements beginning on the date the switch occurs. An initial compliance demonstration as specified in 40 CFR 63 Subpart FFFF must be conducted within 150 days after the switch occurs.
[40 CFR 63.2445(d)]
 - b. Beginning August 12, 2023, in lieu of the requirements specified in 40 CFR 63.7, the Permittee must conduct performance tests for 40 CFR 63 Subpart FFFF under such conditions as the Director specifies based on representative performance of the affected source for the period being tested. Representative conditions exclude periods of startup and shutdown. The Permittee may not conduct performance tests during periods of malfunction. The Permittee must record the process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions represent normal operation. Such records as may be necessary to determine the conditions of performance tests must be made available to the Division upon request.
[40 CFR 63.2450(g)(6)]

40 CFR 63 Subpart SS for – Closed Vent System Requirements

- 4.2.3 The Permittee shall comply with the following provisions for closed vent system inspection and monitoring procedures for closed vent systems subject to the provisions of 40 CFR 63 Subparts FFFF and SS.
[40 CFR 63 Subpart FFFF; 40 CFR 63 Subpart SS; 40 CFR 63.983(c)]
- a. Each closed vent system subject to this paragraph shall be inspected according to the procedures specified in paragraphs a.i. through a.vii. of this condition.
[40 CFR 63.983(c)(1)]
 - i. Inspections shall be conducted in accordance with Method 21 of 40 CFR part 60, appendix A, except as specified in this condition.
[40 CFR 63.983(c)(1)(i)]
 - ii. Except as provided in a.iii. of this condition, the detection instrument shall meet the performance criteria of Method 21 of 40 CFR part 60, appendix A, except the instrument response factor criteria in section 3.1.2(a) of Method 21 must be for the representative composition of the process fluid and not of each individual VOC in the stream. For process streams that contain nitrogen, air, water, or other inerts that are not organic HAP or VOC, the representative stream response factor must be determined on an inert-free basis. The response

factor may be determined at any concentration for which the monitoring for leaks will be conducted.

[40 CFR 63.983(c)(1)(ii)]

- iii. If no instrument is available at the plant site that will meet the performance criteria of Method 21 specified in paragraph a.ii. of this condition, the instrument readings may be adjusted by multiplying by the representative response factor of the process fluid, calculated on an inert-free basis as described in paragraph a.ii. of this condition.

[40 CFR 63.983(c)(1)(iii)]

- iv. The detection instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21 of 40 CFR part 60, appendix A.

[40 CFR 63.983(c)(1)(iv)]

- v. Calibration gases shall be as specified in the following paragraphs.

[40 CFR 63.983(c)(1)(v)]

- (A) Zero air (less than 10 parts per million hydrocarbon in air); and

[40 CFR 63.983(c)(1)(v)(A)]

- (B) Mixtures of methane in air at a concentration less than 10,000 parts per million. A calibration gas other than methane in air may be used if the instrument does not respond to methane or if the instrument does not meet the performance criteria specified in paragraph a.ii. of this condition. In such cases, the calibration gas may be a mixture of one or more of the compounds to be measured in air.

[40 CFR 63.983(c)(1)(v)(B)]

- (C) If the detection instrument's design allows for multiple calibration scales, then the lower scale shall be calibrated with a calibration gas that is no higher than 2,500 parts per million.

[40 CFR 63.983(c)(1)(v)(C)]

- vi. The Permittee may elect to adjust or not adjust instrument readings for background. If the Permittee elects not to adjust readings for background, all such instrument readings shall be compared directly to 500 parts per million to determine whether there is a leak. If the Permittee elects to adjust instrument readings for background, the Permittee shall measure background concentration using the procedures in this section. The Permittee shall subtract the background reading from the maximum concentration indicated by the instrument.

[40 CFR 63.983(c)(1)(vi)]

- vii. If the Permittee elects to adjust for background, the arithmetic difference between the maximum concentration indicated by the instrument and the background level shall be compared with 500 parts per million for determining whether there is a leak.
[40 CFR 63.983(c)(1)(vii)]
- b. The instrument probe shall be traversed around all potential leak interfaces as described in Method 21 of 40 CFR part 60, appendix A.
[40 CFR 63.983(c)(2)]
- c. Except as provided in paragraph d. of this condition, inspections shall be performed when the equipment is in regulated material service, or in use with any other detectable gas or vapor.
[40 CFR 63.983(c)(3)]
- d. Inspections of the closed vent system collecting regulated material from a transfer rack shall be performed only while a tank truck or railcar is being loaded or is otherwise pressurized to normal operating conditions with regulated material or any other detectable gas or vapor.
[40 CFR 63.983(c)(4)]

40 CFR 63 Subpart UU for Equipment Leaks – Test Methods and Procedures

- 4.2.4 The Permittee shall comply with the following test methods and procedures for equipment subject to the provisions of 40 CFR 63 Subpart UU.
[40 CFR 63 Subpart UU; 40 CFR 63.1023]
- a. The Permittee shall comply with the requirements of this paragraph for instrument monitoring as required under 40 CFR 63 Subpart UU:
[40 CFR 63.1023(b)]
 - i. Monitoring shall comply with Method 21 of 40 CFR part 60, appendix A, except as otherwise provided in this condition.
[40 CFR 63.1023(b)(1)]
 - ii. The Permittee shall comply with the following for detection instrument performance criteria.
[40 CFR 63.1023(b)(2)]
 - (A) Except as provided for in paragraph a.ii.B. of this condition, the detection instrument shall meet the performance criteria of Method 21 of 40 CFR part 60, appendix A, except the instrument response factor criteria in section 3.1.2, paragraph (a) of Method 21 shall be for the representative composition of the process fluid not each individual VOC in the stream. For process streams that contain nitrogen, air, water or other inerts that are not HAP or VOC, the representative stream response factor shall be determined on an inert-free basis. The response factor may be determined at any concentration for which monitoring for leaks will be conducted.

[40 CFR 63.1023(b)(2)(i)]

- (B) If there is no instrument commercially available that will meet the performance criteria specified in paragraph a.i.A. of this condition, the instrument readings may be adjusted by multiplying by the representative response factor of the process fluid, calculated on an inert-free basis as described in paragraph a.i.A. of this condition.

[40 CFR 63.1023(b)(2)(ii)]

- iii. The detection instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21 of 40 CFR part 60, appendix A.

[40 CFR 63.1023(b)(3)]

- iv. Calibration gases shall be zero air (less than 10 parts per million of hydrocarbon in air); and the gases specified in paragraph a.iv.A. of this condition except as provided in paragraph a.iv.B. of this condition.

[40 CFR 63.1023(b)(4)]

- (A) Mixtures of methane in air at a concentration no more than 2,000 parts per million greater than the leak definition concentration of the equipment monitored. If the monitoring instrument's design allows for multiple calibration scales, then the lower scale shall be calibrated with a calibration gas that is no higher than 2,000 parts per million above the concentration specified as a leak, and the highest scale shall be calibrated with a calibration gas that is approximately equal to 10,000 parts per million. If only one scale on an instrument will be used during monitoring, the Permittee need not calibrate the scales that will not be used during that day's monitoring.

[40 CFR 63.1023(b)(4)(i)]

- (B) A calibration gas other than methane in air may be used if the instrument does not respond to methane or if the instrument does not meet the performance criteria specified in paragraph a.i.A. of this condition. In such cases, the calibration gas may be a mixture of one or more of the compounds to be measured in air.

[40 CFR 63.1023(b)(4)(ii)]

- v. Monitoring shall be performed when the equipment is in regulated material service or is in use with any other detectable material.

[40 CFR 63.1023(b)(5)]

- vi. Monitoring data obtained prior to the regulated source becoming subject to the referencing subpart that do not meet the criteria specified in paragraphs a.i. through a.iv. of this condition may still be used to qualify initially for less frequent monitoring under the provisions in 40 CFR 63.1025(a)(2), Condition 3.3.29.a.iii., or Condition 3.3.29.a.iv. for valves provided the departures from the criteria or from the specified monitoring frequency of those conditions are minor and do not significantly affect the quality of the data. Examples of minor

departures are monitoring at a slightly different frequency (such as every 6 weeks instead of monthly or quarterly), following the performance criteria of section 3.1.2, paragraph (a) of Method 21 of Appendix A of 40 CFR part 60 instead of paragraph a.ii. of this condition, or monitoring using a different leak definition if the data would indicate the presence or absence of a leak at the concentration specified in this subpart. Failure to use a calibrated instrument is not considered a minor departure.

[40 CFR 63.1023(b)(6)]

- b. The Permittee may elect to adjust or not to adjust the instrument readings for background. If the Permittee elects not to adjust instrument readings for background, the Permittee shall monitor the equipment according to the procedures specified in paragraphs a.i. through a.v. of this condition. In such cases, all instrument readings shall be compared directly to the applicable leak definition for the monitored equipment to determine whether there is a leak or to determine compliance with Condition 3.3.33.a (pressure relief devices). If the Permittee elects to adjust instrument readings for background, the Permittee shall monitor the equipment according to the procedures specified below:

[40 CFR 63.1023(c)]

- i. The requirements of paragraphs a.i. through a.v. of this condition shall apply.
[40 CFR 63.1023(c)(1)]
- ii. The background level shall be determined, using the procedures in Method 21 of 40 CFR part 60, appendix A.
[40 CFR 63.1023(c)(2)]
- iii. The instrument probe shall be traversed around all potential leak interfaces as close to the interface as possible as described in Method 21 of 40 CFR part 60, appendix A.
[40 CFR 63.1023(c)(3)]
- iv. The arithmetic difference between the maximum concentration indicated by the instrument and the background level shall be compared to the applicable leak definition for the monitored equipment to determine whether there is a leak or to determine compliance with Condition 3.3.33.a (pressure relief devices).
[40 CFR 63.1023(c)(4)]

- c. Sensory monitoring under 40 CFR 63 Subpart UU consists of visual, audible, olfactory, or any other detection method used to determine a potential leak to the atmosphere.

[40 CFR 63.1023(d)]

40 CFR 63 Subpart DDDDD

- 4.2.5 If the Permittee elects to comply through performance testing, the Permittee shall comply with all applicable provisions of 40 CFR 63.7510 and 40 CFR 63.7530 for initial compliance demonstrations through performance testing under 40 CFR 63 Subpart DDDDD for the No. 9 Boiler (Source Code P009). The performance tests shall be conducted in accordance with 40 CFR 63.7520 and Table 5 of 40 CFR 63 Subpart DDDDD. The Permittee shall establish operating limits in Table 4 of 40 CFR 63 Subpart DDDDD, as applicable, in accordance with 40 CFR 63.7530 and Table 7 of 40 CFR 63 Subpart DDDDD.
[40 CFR 63.7510 and 40 CFR 63.7530]
- 4.2.6 If the Permittee elects to comply through performance testing, the Permittee shall comply with all applicable provisions of 40 CFR 63.7515 for performance testing under 40 CFR 63 Subpart DDDDD subsequent to the initial performance tests required by Condition No. 4.2.5 for the No. 9 Boiler (Source Code P009). The subsequent performance tests shall be conducted on an annual basis in accordance with 40 CFR 63.7520 and Table 5 of 40 CFR 63 Subpart DDDDD, except as specified in 40 CFR 63.7515(b) through (e), (g), and (h). The Permittee shall either verify that the applicable operating limits in Table 4 of 40 CFR 63 Subpart DDDDD have not changed or reestablish the operating limits in accordance with 40 CFR 63.7530 and Table 7 of 40 CFR 63 Subpart DDDDD. The reports for all subsequent performance tests must include all applicable information required in 40 CFR 63.7550.
[40 CFR 63.7515; 391-3-1-.02(2)(d)2(iii)]
- a. Where the results of a performance test which is required annually are less than or equal to 75 percent of the applicable limits specified by Condition 3.3.38 for a given pollutant for at least 2 consecutive years, and if there are no changes in the operation of the boiler or air pollution control equipment that could increase emissions, the Permittee may choose to conduct performance tests for that pollutant every third year. Each such performance test must be conducted no more than 37 months after the previous performance test.
 - b. If a performance test shows emission exceeded the emission limit or 75 percent of the emission limit for a pollutant, the Permittee must conduct annual performance tests for that pollutant until all performance tests over a consecutive 2-year period meet the required level (at or below 75% of the emission limit).
- 4.2.7 The Permittee shall conduct tune-ups on the equipment listed below in accordance with the applicable requirements of 40 CFR 63 Subpart DDDDD:
[40 CFR 63.7515, 40 CFR 63.7540(a)(10) and (12), Table 3 to 40 CFR 63 Subpart DDDDD]

Title V Permit

Pinova, Inc.

Permit No.: 2861-127-0002-V-07-0

Emission Unit	Tune-up Frequency
No. 9 Boiler (Source Code P009)	Annually
No. 10 Boiler (Source Code P010)	Every 5 years
Hard Resin Dowtherm Boiler (HR01)	Biennially
Liquid Resins Xceltherm Vaporizer (LR02)	Biennially
Terpene Resins Hot Oil Heater (TR08)	Every 5 years
SCP Resins Dowtherm Boiler (SP06)	Every 5 years
Gum Rosin Distillation Dowtherm Boiler (GRD01)	Every 5 years

4.2.8 For the No. 10 Boiler (Source Code P010), to determine compliance with the emission limits for NO_x required under Condition No. 3.2.10.b and 3.2.10.c, the Permittee shall conduct the performance test as required under 40 CFR 60.8 using the NO_x continuous system for monitoring required by Condition No. 5.2.1.b:
[391-3-1-.02(3), 391-3-1-.03(2)(c), 40 CFR 60.44b(a), 40 CFR 60.46b(e)(1) and (4), 40 CFR 60.41b]

- a. For the initial compliance test, nitrogen oxides (NO_x) from the steam generating unit are monitored for 30 successive steam generating unit operating days and the 30-day average emission rate is used to determine compliance with the nitrogen oxides (NO_x) emission standard in Condition 3.2.10.b and 3.2.10.c. The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period.
- b. Following the date on which the initial performance test is completed, the Permittee shall upon request determine compliance with the nitrogen oxides (NO_x) emissions standards under Condition 3.2.10.b and 3.2.10.c through the use of a 30-day performance test. During periods when performance tests are not requested, NO_x emissions data collected pursuant to 40 CFR 60.48b(g)(1) are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the NO_x emission standards. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NO_x emission data for the preceding 30 steam generating unit operating days.
- c. A steam generating unit operating day shall be defined as a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**5.1 General Monitoring Requirements**

- 5.1.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.
[391-3-1-.02(6)(b)1]

5.2 Specific Monitoring Requirements

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated pollutants on the following equipment. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. O₂ from the No. 9 Boiler (Source Code P009).
[40 CFR 63.7525(a) and Table 4, Item 8 of 40 CFR 63 Subpart DDDDD]
 - b. For the No. 10 Boiler (Source Code P010) – A Continuous Emissions Monitoring System (CEMS) for the measurement of nitrogen oxides (NO_x) concentration (ppm) and diluent concentrations (either Oxygen [O₂] or Carbon Dioxide [CO₂], percent). The output of the CEMS shall be expressed in terms of both lb/MMBtu and lb/MMBtu as NO₂.
[40 CFR 52.21 Avoidance and 40 CFR 60.44b(a)]
 - c. For the No. 10 Boiler (Source Code P010) – A Continuous Emissions Monitoring System (CEMS) for the measurement of carbon monoxide (CO) concentration (ppm) and diluent concentrations (either Oxygen (O₂) or Carbon Dioxide (CO₂), percent). The output of the CEMS shall be expressed in terms of lb/MMBtu CO.
[40 CFR 52.21 Avoidance]
- 5.2.2 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. Old Extractor Area
 - i. Corvus Oil Scrubber flow to the Corvus Oil Scrubber (Source Code EBC1) for the Old Extractor Group (Source Code EBG1).
 - ii. Pressure Drop across the Corvus Oil Scrubber (Source Code EBC1).

- iii. Water flow to the Old Extractor Spray Tower #1 (Source Code EBC4) for the Old Crown Extractor Group (Source Code EBG1).
- b. Crown Extractor Area
 - i. Scrubbant Flow to the Crown Oil Scrubber (Source Code EAC1) for the Crown Extractor Group (Source Code EXG1).
 - ii. Scrubbant Flow (chilled and non-chilled) to the Crown Area Spray Tower (Source Code EAC3) for the Crown Extractor Group (Source Code EXG1).
 - iii. Inlet vapor temperature of the Crown Area Spray Tower (Source Code EAC3) for the Crown Extractor Group (Source Code EXG1).
 - iv. Dome temperature and pressure of the Desolventizer for the Crown Extractor Group (Source Code EXG1).
- c. Pexite Plant
 - i. Corvus Oil FlowRate at the inlet of the Scrubber.
 - ii. Vent gas exit temperature (Source Code PXC1) for the Refining Process (Source Code PXG1).
- d. Hard Resins Processing
 - i. Temperature of the combustion zone at a position prior to any substantial heat loss/exchange of the Hard Resins Thermal Oxidizer (Source Code HRTO). The temperature data shall be maintained in accordance with Conditions 6.2.17 and 6.2.18.
 - ii. Scrubbant Flow Rate to the Venturi Scrubbers (Source Code HRVS).
 - iii. Pressure Drop across the Hard Resins Venturi Scrubber (Source Code HRVS).
- e. Terpene Resins
 - i. Temperature of the uncondensed gas stream exiting the Wash System Condenser (Source Code TRC2) for the Terpene Resins Reactors (Source Code TR02).
 - ii. Temperature of the uncondensed gas stream exiting the Dechlor Condenser (Source Code TRC3) for the Terpene Resins Dechlorinators (Source Code TR03).
 - iii. Temperature of the uncondensed gas stream exiting the Condenser E26 (Source Code TRC4) for the Terpene Resins Lochem Filter (Source Code TR04).

- iv. Temperature of the uncondensed gas stream exiting the Jet After-Condenser (Source Code TRC7) or Spare Condenser (Source Code TRC8) for the Terpene Resins LTC Evaporation System (Source Code TR07).
- f. Liquid Resins/Specialty Chemical Processing (SCP)
 - i. Make Up Scrubbant Flow Rate for the Packed Tower Scrubber (Source Code LRC2) for the Liquid Resins Stills and Towers (Source Code LRG1).
 - ii. Scrubbant Flow Rate of the Venturi Scrubber (Source Code LRC1) for the Liquid Resins Stills & Towers (Source Code LRG1).
 - iii. Make Up Scrubbant Flow Rate of the Venturi Scrubber (Source Code LRC1) for the Liquid Resins Stills & Towers (Source Code LRG1).
- g. Distillation
 - i. Temperature of the vent gas stream exiting the Condenser (Source Code SC40) for the Stillhouse Batch Stills & Continuous Distillation Columns (Source Code SHG1).
- h. Power Plant Operations
 - i. Scrubbant flow rate of the No. 9 Boiler Venturi Scrubber (Source Code PC9B).
 - ii. Gas stream Pressure Loss through the No. 9 Boiler Venturi Scrubber (Source Code PC9B).
 - iii. Steam production rate (operating load) of the No. 9 Boiler (Source Code P009). [Table 8 of 40 CFR 63 Subpart DDDDD]

5.2.3 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Crown Extractor
 - i. Gas Phase Pressure Loss across the Crown Oil Scrubber (Source Code EAC1) for the Crown Extractor Group (Source Code EXG1). Data shall be recorded continuously.

- b. Pexite Plant
 - i. Recirculation flow rate of the scrubbant from the Pexite Spray Tower (Source Code PXC0) for the Resin Refining Process (Source Code PXG1). Data shall be recorded continuously.
- c. Vinsol Area
 - i. Differential Pressure across each Dust Collector (Source Codes VC01 – VC04) for the Vinsol Bagging Process (Source Code VG01). Data shall be recorded daily.
- d. Staybelite/Foral Area
 - i. Temperature of the uncondensed gas stream from the Primary Condenser (Source Code SAC4) for the Staybelite Still (Source Code SA04). Data shall be recorded at least once for every 8 hours of operation.
 - ii. Scrubbant Flow Rate and Makeup Flow Rate for the Packed Tower Scrubber (Source Code SAC3) for the Staybellite & Foral Resin Reactors (Source Code SAG1). Data shall be recorded continuously.
- e. Hard Resins Bagging
 - i. Pressure Drop across Hard Resins Baghouses HRC7, HRC8 and HRC9. Data shall be recorded daily.
- f. Liquid Resins/Specialty Chemical Processing (SCP)
 - i. Inlet Supply Pressure to the Spray Tower (Source Code SPC1) for the SCP Reactor R-403 (Source Code SP01). Data shall be recorded continuously for MON compliance.
 - ii. Temperature of the Gas Stream exiting the Spray Tower (Source Code SPC1) for the SCP Reactor R-403 (Source Code SP01). Data shall be recorded continuously for MON compliance.
- g. Extraction/Refinery
 - i. Wood hopper level (percent). Data shall be recorded once per hour.
 - ii. Slide gate position (open or closed). Data shall be recorded once per hour.

5.2.4 The Permittee shall comply with the following monitoring and recordkeeping requirements for LDAR (a ratio of 0.2958 MIBK to VOC may be used unless a more representative ratio is established):

- a. MIBK concentrations at the Crown Extractor Wood Inlet Vent shall be monitored and recorded weekly.
- b. Maintain records of audits and corrective LDAR actions. Corrective actions should be taken within 8 hours of the discovery of MIBK concentrations greater than 1000 ppm.
- c. Temperature readings at the Crown Head Space shall be monitored and recorded continuously.
- d. Timely corrective actions shall be instituted, in accordance with the MON SSMP, for any Crown Head Space temperature above 165°F.

5.2.5 The Permittee shall perform a check of the visible emissions from each baghouse listed in Table 3.1. Checks shall be conducted each day any of the emission units controlled by the baghouse (s) are operated. The Permittee shall retain a record in a visible emissions (VE) log suitable for inspection or submittal. The checks shall be conducted using the following procedure:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. The person performing the determination shall stand at a distance of at least 15 feet, which is sufficient to provide a clear view of the plume against a contrasting background with the sun in the 140 degrees sector at his/her back. Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Only one exhaust point shall be in the line of sight at any time when multiple emission points are in proximity to each other.
- b. For each source that exhibits visible emissions, the Permittee shall determine the cause and correct the problem in the most expedient manner possible. The Permittee shall note the cause of the visible emissions, the pressure drop, any other pertinent operating parameters, and the corrective action taken in the maintenance log.

5.2.6 For each baghouse listed in Table 3.1 equipped with a stack to meet any PM emissions limitation conduct inspections at the following frequencies:
[391-3-1-.02(2)(b)1]

- a. Monitor the pressure drop across each baghouse cell each day.
- b. Confirm that dust is being removed from hoppers through weekly visual inspections.
- c. Check the compressed air supply for pulse-jet baghouses each day.
- d. Monitor cleaning cycles to ensure proper operation using an appropriate methodology.
- e. Check bag cleaning mechanisms for proper functioning through monthly visual inspections.

- f. Make monthly visual checks of bag tension on reverse air and shaker-type baghouses to ensure that bags are not kinked (knead or bent) or lying on their sides.
 - g. Confirm the physical integrity of the baghouse through quarterly visual inspections of the baghouse interior for air leaks.
 - h. Inspect fans for wear, material buildup, and corrosion through quarterly visual inspections, vibration detectors, or equivalent means.
- 5.2.7 For the sources exempted from 40 CFR Part 60 Subpart VV the Permittee shall record the following information in a log that is kept in a readily accessible location for use in determining exemptions as provided in 40 CFR 60.480(d):
[40 CFR 60.486(i)]
- a. An analysis demonstrating the design capacity of the affected facility;
 - b. A statement listing the feed raw materials and products from the affected facilities and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohol; and
 - c. An analysis demonstrating that the equipment is not in VOC service.

40 CFR 63 Subpart FFFF

- 5.2.8 The Permittee shall comply with the following requirements for all continuous parameter monitoring systems in addition to the applicable requirements of 40 CFR 63 Subpart SS for continuous parameter monitoring systems (CPMS):
[40 CFR 63.2450(k)]
- a. The Permittee must record the results of each calibration and check all maintenance performed on the CPMS as specified in 40 CFR 63.998(c)(1)(ii)(A). Beginning August 12, 2023, the Permittee must record all maintenance, not just preventative maintenance.
[40 CFR 63.2450(k)(1)(i and ii)]
 - b. Beginning August 12, 2023, the manufacturer's specifications or the Permittee's written procedures must include a schedule for calibrations, preventative maintenance procedures, a schedule for preventative maintenance, and corrective actions to be taken if a calibration fails. If a CPMS calibration fails, the CPMS is considered inoperative until corrective action is taken and the system passes calibration. The Permittee must record the nature and cause of instances when the CPMS is inoperative and the corrective action taken.
[40 CFR 63.2450(k)(7)]

- 5.2.9 The Permittee shall install, calibrate, and operate a flow indicator at the inlet or outlet of any control device used to comply with the provisions of 40 CFR 63 Subpart FFFF to identify periods of no flow for applicable operations. Periods of no flow may not be used in daily averages and it may not be used in fulfilling a minimum data availability requirement.
[40 CFR 63 Subpart FFFF; 40 CFR 63.2460(c)(7)]
- 5.2.10 The Permittee shall monitor the Cooling Tower Water System cooling water. The cooling water shall be monitored for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more speciated HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system.
[40 CFR 63 Subpart FFFF; 40 CFR 63.2490; 40 CFR 63.104]
- a. Monitoring shall be conducted as follows, except as provided in paragraph d of this condition:
- i. The cooling water shall be monitored monthly for the first 6 months and quarterly thereafter to detect leaks. For recirculating heat exchange systems (cooling tower systems), the monitoring of speciated hazardous air pollutants or total hazardous air pollutants refers to the hazardous air pollutants listed in Table 4 of 40 CFR 63 Subpart F.
[40 CFR 63.104(b)(1) and (2)(i)]
 - ii. The concentration of the monitored substance(s) in the cooling water shall be determined using any EPA-approved method listed in part 136 of Chapter I as long as the method is sensitive to concentrations as low as 10 parts per million and the same method is used for both entrance and exit samples. Alternative methods may be used upon approval by the Administrator.
[40 CFR 63.104(b)(3)]
 - iii. The samples shall be collected either at the entrance and exit of each heat exchange system or at locations where the cooling water enters and exits each heat exchanger or any combination of heat exchangers. For samples taken at the entrance and exit of recirculating heat exchange systems, the entrance is the point at which the cooling water leaves the cooling tower prior to being returned to the process equipment and the exit is the point at which the cooling water is introduced to the cooling tower after being used to cool the process fluid.
[40 CFR 63.104(b)(4)]
 - iv. A minimum of three sets of samples shall be taken at each entrance and exit as defined in paragraph a.iii. of this condition. The average entrance and exit concentrations shall then be calculated. The concentration shall be corrected for the addition of any makeup water or for any evaporative losses, as applicable.
[40 CFR 63.104(b)(5)]

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- v. A leak is detected if the exit mean concentration is found to be greater than the entrance mean using a one-sided statistical procedure at the 0.05 level of significance and the amount by which it is greater is at least 1 part per million or 10 percent of the entrance mean, whichever is greater.
[40 CFR 63.104(b)(6)]
- b. If a leak is detected according to the criteria of paragraph a. of this condition, the Permittee shall comply with the requirements in the following paragraphs, except as provided in paragraph c. of this condition
[40 CFR 63.104(d)]
 - i. The leak shall be repaired as soon as practical but not later than 45 calendar days after the Permittee receives results of monitoring tests indicating a leak. The leak shall be repaired unless the Permittee demonstrates that the results are due to a condition other than a leak.
[40 CFR 63.104(d)(1)]
 - ii. Once the leak has been repaired, the Permittee shall confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later.
[40 CFR 63.104(d)(2)]
- c. Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown and any one of the conditions in following paragraphs is met. All time periods in the following paragraphs shall be determined from the date when the Permittee determines that delay of repair is necessary.
[40 CFR 63.104(e)]
 - i. If a shutdown is expected within the next 2 months, a special shutdown before that planned shutdown is not required.
[40 CFR 63.104(e)(1)]
 - ii. If a shutdown is not expected within the next 2 months, the Permittee may delay repair as provided in the following paragraphs. Documentation of a decision to delay repair shall state the reasons repair was delayed and shall specify a schedule for completing the repair as soon as practical.
[40 CFR 63.104(e)(2)]
 - (A) If a shutdown for repair would cause greater emissions than the potential emissions from delaying repair, the Permittee may delay repair until the next shutdown of the process equipment associated with the leaking heat exchanger. The Permittee shall document the basis for the determination that a shutdown for repair would cause greater emissions than the emissions likely to result from delaying repair as specified in the following paragraphs.
[40 CFR 63.104(e)(2)(i)]

(I) The Permittee shall calculate the potential emissions from the leaking heat exchanger by multiplying the concentration of total hazardous air pollutants listed in Table 4 of 40 CFR 63 Subpart F in the cooling water from the leaking heat exchanger by the flowrate of the cooling water from the leaking heat exchanger by the expected duration of the delay. The Permittee may calculate potential emissions using total organic carbon concentration instead of total hazardous air pollutants listed in Table 4 of 40 CFR 63 Subpart F.

[40 CFR 63.104(e)(2)(i)(A)]

(II) The Permittee shall determine emissions from purging and depressurizing the equipment that will result from the unscheduled shutdown for the repair.

[40 CFR 63.104(e)(2)(i)(B)]

(B) If repair is delayed for reasons other than those specified in paragraph c.ii.A. of this condition, the Permittee may delay repair up to a maximum of 120 calendar days. The Permittee shall demonstrate that the necessary parts or personnel were not available.

[40 CFR 63.104(e)(2)(ii)]

d. Unless one or more of the conditions specified in 40 CFR 63.104(a)(1), (2), (5), and (6) are met, on or before August 12, 2023, the requirements of 40 CFR 63.104 and paragraphs b and c of this condition no longer apply. Instead, the Permittee must monitor the cooling water for the presence of total strippable hydrocarbons that indicate a leak according to (d)(i) of this condition, and if the Permittee detects a leak, then it must be repaired according to the paragraphs (d)(ii) and (d)(iii) of this condition, unless repair is delayed according to paragraph (d)(iv) of this condition. At any time before August 12, 2023, the Permittee may choose to comply with the requirements of paragraph (d) of this condition in lieu of the requirements of 40 CFR 63.104 and paragraphs (b) and (c) of this condition. The requirements in this paragraph (d) of this Condition do not apply to heat exchange systems that have a maximum cooling water flow rate of 10 gallons per minute or less.

i. The Permittee must perform monitoring to identify leaks of total strippable hydrocarbons from each applicable heat exchange system according to the procedures in paragraphs (d)(i)(A) through (E) of this condition.

(A) For each closed loop recirculating heat exchange system, the Permittee must collect and analyze a sample from the location(s) described in 40 CFR 63.2490(d)(1)(i)(A) or (B).

(B) For each once-through heat exchange system, the Permittee must collect and analyze a sample from the location(s) described in paragraph 40 CFR 63.2490(d)(ii)(A) and (B).

- (C) If the Permittee complies with the total strippable hydrocarbon concentration leak action level as specified in paragraph (d)(i)(D) of this condition and 40 CFR 63.2490(d)(1)(iv), the Permittee must comply with determining the strippable hydrocarbon concentration and total hydrocarbon mass emissions rate using the Modified El Paso Method as described in 40 CFR 63.2490(d)(1)(iii)(A) and (B).
 - (D) For each heat exchange system, the Permittee must initially monitor monthly for 6-months beginning upon startup and monitor quarterly thereafter using a leak action level defined as a total strippable hydrocarbon concentration (as methane) in the stripping gas of 6.2 ppmv or, for heat exchange systems with a recirculation rate of 10,000 gallons per minute or less, the Permittee may monitor quarterly using a leak action level defined as a total hydrocarbon mass emissions rate from the heat exchange system (as methane) of 0.18 kg/hr. If a leak is detected as specified in paragraph (d)(i)(E) below, then the Permittee must monitor monthly until the leak has been repaired according to the requirements of paragraphs (d)(ii) or (iii) of this condition. Once the leak has been repaired according to the requirements of (d)(ii) or (iii) of this condition, quarterly monitoring for the heat exchange system may resume. The monitoring frequencies specified in this paragraph (d)(i)(D) of this condition also apply to the inlet water feed line for a once-through heat exchange system, if monitoring of the inlet water feed is elected as provided in 40 CFR 63.2490(d)(1)(ii)(B).
 - (E) The leak definitions for heat exchange systems are defined as described in 40 CFR 63.2490(d)(1)(v).
- ii. If a leak is detected using the methods described in (d)(i) of this condition, the Permittee must repair the leak to reduce the concentration or mass emissions rate to below the applicable leak action level as soon as practicable, but no later than 45 days after identifying the leak, except as specified in paragraph (d)(iv) of this condition. Repair must include re-monitoring at the monitoring location where the leak was identified according to the method specified in (d)(i) of this condition to verify that the total strippable hydrocarbon concentration or total hydrocarbon mass emissions rate is below the applicable leak action level. Repair may also include performing the additional monitoring in paragraph (d)(iii) of this condition to verify that the total strippable hydrocarbon concentration or total hydrocarbon mass emissions rate is below the applicable leak action level. Actions that can be taken to achieve repair are included in, but not limited to, those provided in CFR 63.2490(d)(2).
 - iii. If the Permittee detects a leak when monitoring a cooling tower return line, the Permittee may conduct additional monitoring of each heat exchanger or group of heat exchangers associated with the heat exchange system for which a leak was detected. If no leaks are detected when monitoring, the heat exchange system is considered to have met the repair requirements through re-monitoring of the heat exchange system, as provided in paragraph (d)(ii) of this condition.

- iv. The Permittee may delay repair when one of the conditions in 40 CFR 63.2490(d)(4)(i) or (ii) is met and the leak is less than the delay or repair action level specified in 63.2490(d)(4)(iii). The Permittee must determine if a delay of repair is necessary as soon as practicable, but no later than 45 days after first identifying the leak.

Compliance Assurance Monitoring

- 5.2.11 The following pollutant specific emission unit(s) (PSEU) is/are subject to the Compliance Assurance Monitoring (CAM) Rule in 40 CFR 64.

Emission Unit	Pollutant
No. 9 Boiler	PM
Vinsol Bagging Area VG-01	PM
Hard Resins HRC-7, HRC-8, HRC-9	PM

Permit conditions in this permit for the PSEU(s) listed above with regulatory citation 40 CFR 70.6(a)(3)(i) are included for the purpose of complying with 40 CFR 64. In addition, the Permittee shall meet the requirements, as applicable, of 40 CFR 64.7, 64.8, and 64.9. [40 CFR 64]

- 5.2.12 The Permittee shall comply with the performance criteria listed in the table below for the Particulate matter emissions from the No. 9 Boiler.
[40 CFR 64.6(c)(1)(iii)]

Performance Criteria [64.4(a)(3)]	Indicator No. 1 Scrubbant Flow Rate	Indicator No. 2 Pressure Drop Across Scrubber
A. Data Representativeness [64.3(b)(1)]	The flow rate is measured using standard instrumentation provided for this purpose.	The differential pressure across the scrubber will be measured using standard instrumentation provided for this purpose.
B. Verification of Operational Status (new/modified monitoring equipment only) [64.3(b)(2)]	N/A	N/A
C. QA/QC Practices and Criteria [64.3(b)(3)]	Annual Calibration.	Annual Calibration.
D. Monitoring Frequency [64.3(b)(4)]	Continuous	Continuous
E. Data Collection Procedures [64.3(b)(4)]	Recorded by the process control computer	Recorded by the process control computer

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Performance Criteria [64.4(a)(3)]	Indicator No. 1 Scrubbant Flow Rate	Indicator No. 2 Pressure Drop Across Scrubber
F. Averaging Period [64.3(b)(4)]	8 hour average	8 hour average

- 5.2.13 The Permittee shall comply with the performance criteria listed in the table below for the Particulate Matter emissions from Vinsol Bagging Area (Emission Units VG-01) and Hard Resins Bagging (HRG2).
[40 CFR 64.6(c)(1)(iii)]

Performance Criteria [64.4(a)(3)]	Indicator No. 1 Pressure Drop	Indicator No. 2 Visible Emissions
A. Data Representativeness [64.3(b)(1)]	Differential pressure gauge is used to measure pressure drop across the baghouse	Visible emissions inspections will be performed following the procedures in Condition 5.2.5.
B. Verification of Operational Status (new/modified monitoring equipment only) [64.3(b)(2)]	N/A	N/A
C. QA/QC Practices and Criteria [64.3(b)(3)]	Perform calibration per manufacturers recommendation	Annual refresher training on proper verification techniques
D. Monitoring Frequency [64.3(b)(4)]	Daily	Daily
E. Data Collection Procedures [64.3(b)(4)]	Pressure drop readings are recorded in a log	Visible emissions observations are recorded in a log.
F. Averaging Period [64.3(b)(4)]	N/A	Any two consecutive daily determinations of visible emissions for which visible emissions are present.

40 CFR 63 Subpart DDDDD

- 5.2.14 If the Permittee elects to comply through fuel analysis, the Permittee shall comply with all applicable provisions of 40 CFR 63.7510 and 40 CFR 63.7530 for initial compliance demonstrations through fuel analysis under 40 CFR 63 Subpart DDDDD for the No. 9 Boiler (Source Code P009). The initial fuel analyses shall be conducted in accordance with 40 CFR 63.7521 and Table 6 of 40 CFR 63 Subpart DDDDD. The Permittee shall establish operating limits in Table 4 of 40 CFR 63 Subpart DDDDD, as applicable, in accordance with 40 CFR 63.7530 and Table 8 of 40 CFR 63 Subpart DDDDD.
[40 CFR 63.7510 and 40 CFR 63.7530]
- 5.2.15 If the Permittee elects to comply through fuel analysis, the Permittee shall comply with all applicable provisions of 40 CFR 63.7515 for fuel analyses under 40 CFR 63 Subpart DDDDD subsequent to the initial fuel analyses required by Condition No. 5.2.14 for the No. 9 Boiler (Source Code P009). The subsequent fuel analyses shall be conducted on a monthly basis in accordance with 40 CFR 63.7521 and Table 6 of 40 CFR 63 Subpart DDDDD, except as specified in 40 CFR 63.7515(e). A fuel analysis shall be conducted on any new type of fuel before burning a new type of fuel in the No. 9 Boiler (Source Code P009), and the applicable emission rates shall be recalculated in accordance with 40 CFR 63.7540.
[40 CFR 63.7515 and 40 CFR 63.7540]
- 5.2.16 For the No. 9 Boiler Venturi Scrubber (Source Code PCB8) and the continuous monitoring systems required by 40 CFR 63 Subpart DDDDD, the Permittee shall meet the following criteria:
[40 CFR 63.7525(d), (e), (f), & (g)]
- a. The CPMS shall complete a minimum of one cycle of operation every 12 minutes. The Permittee must have a minimum of four successive cycles of operation, one representing each of the four 15-minute periods in an hour, to have a valid hour of data.
 - b. The Permittee shall operate the monitoring system as specified in 40 CFR 63.7535(b) and comply with the data calculation requirements specified in 40 CFR 63.7535(c).
 - c. Any 15-minute period for which the monitoring system is out-of-control and data are not available for a required calculation constitutes a deviation from the monitoring requirements. Other situations that constitute a monitoring deviation are specified in 40 CFR 63.7535(d).
 - d. The 30-day rolling average of all recorded readings, except as provided in 40 CFR 63.7535(c), shall be determined.
 - e. The results of each inspection, calibration, and validation check shall be recorded.
 - f. The flow monitoring system shall meet the following requirements:

- i. The flow sensor and other necessary equipment shall be installed in a position that provides a representative flow.
 - ii. A flow sensor with a measurement sensitivity of no greater than 2% of the design flow rate shall be used.
 - iii. The effects of swirling flow or abnormal velocity distributions due to upstream and downstream disturbances shall be minimized, consistent with good engineering practices.
 - iv. A flow monitoring system performance evaluation shall be conducted in accordance with the monitoring plan at the time of each performance test but no less frequent than annually.
- g. The pressure monitoring system shall meet the following requirements.
 - i. The pressure sensor(s) shall be installed in a position that provides a representative measurement of the pressure.
 - ii. Pulsating pressure, vibration, and internal and external corrosion shall be minimized or eliminated consistent with good engineering practices.
 - iii. A pressure sensor with a minimum tolerance of 1.27 centimeters of water or a minimum tolerance of 1% of the pressure monitoring system operating range, whichever is less, shall be used.
 - iv. Checks shall be performed at least once each process operating day to ensure pressure measurements are not obstructed (e.g. check for pressure tap pluggage daily).
 - v. A performance evaluation of the pressure monitoring system shall be conducted in accordance with the monitoring plan at the time of each performance test but no less frequently than annually.
 - vi. If at any time the measured pressure exceeds the manufacturer's specified maximum operating pressure range, a performance evaluation of the pressure monitoring system shall be conducted in accordance with the monitoring plan and it shall be confirmed that the pressure monitoring system continues to meet the performance requirements in the monitoring plan. Alternatively, a new pressure sensor shall be installed and its operation verified.

40 CFR 60 Subpart Db

- 5.2.17 The CEMS required by Condition 5.2.1.b shall be operated and data recorded during all periods of operation of the No. 10 Boiler (Source Code P010) except for CEMS breakdowns and repairs. Data shall be recorded during calibration checks, and zero and span adjustments. The 1-hour average NO_x emission rates measured by the continuous NO_x monitor shall be expressed in lb/MMBtu heat input and lb/MMBtu heat input expressed as NO₂ and shall be used to calculate the average emission rates under Condition 3.2.10. The 1-hour averages shall be calculated using the data points required under 40 CFR 60.13(h)(2). The span value for NO_x while firing natural gas shall be 500 ppm. As an alternative, the Permittee may elect to use the NO_x span value computed and rounded off in accordance with Section 2.1.2 in Appendix A to Part 75.
[40 CFR 60.48b(b)(1), (c), (d), (e)(2), (e)(3) and (g)(1)]
- 5.2.18 When NO_x emission data are not obtained because of CEMS breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7 of appendix A, Method 7A of appendix A, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.
[40 CFR 60.48b(f) and 40 CFR 60.48b(g)(1)]
- 5.2.19 For all CEMS installed on the No. 10 Boiler (Source Code P010), the Permittee shall perform quarterly accuracy determinations and daily calibration drift tests in accordance with Appendix F of 40 CFR Part 60.
[40 CFR 60.13]

PART 6.0 RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**

- 6.1.1 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and to the EPA. The records shall be retained for at least five (5) years following the date of entry.

[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)]

- 6.1.2 In addition to any other reporting requirements of this Permit, the Permittee shall report to the Division in writing, within seven (7) days, any deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning, or emissions control equipment for a period of four hours or more which results in excessive emissions.

The Permittee shall submit a written report that shall contain the probable cause of the deviation(s), duration of the deviation(s), and any corrective actions or preventive measures taken.

[391-3-1-.02(6)(b)1(iv), 391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(iii)(B)]

- 6.1.3 The Permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in this permit and/or any failure to comply with or complete a work practice standard or requirement contained in this permit which are not otherwise reported in accordance with Conditions 6.1.4 or 6.1.2. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by this permit. The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by August 29 and February 28, respectively following each reporting period, and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken.

[391-3-1-.03(10)(d)1.(i) and 40 CFR 70.6(a)(3)(iii)(B)]

- 6.1.4 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each quarterly period ending March 31, June 30, September 30, and December 31 of each year. All reports shall be postmarked by May 30, August 29, November 29, and February 28, respectively following each reporting period. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)(A)]

- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
- b. Total process operating time during each reporting period.

- c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.
- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

6.1.5 Where applicable, the Permittee shall keep the following records:
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(ii)(A)]

- a. The date, place, and time of sampling or measurement;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of such analyses; and
- f. The operating conditions as existing at the time of sampling or measurement.

6.1.6 The Permittee shall maintain files of all required measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; and adjustments and maintenance performed on these systems or devices. These files shall be kept in a permanent form suitable for inspection and shall be maintained for a period of at least five (5) years following the date of such measurements, reports, maintenance and records.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6 (a)(3)(ii)(B)]

- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)]
- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)
 - i. Excess emissions are defined as any calculated 30-day rolling average NO_x emission rate from the No. 10 Boiler (Source Code P010), as determined in accordance with Condition No. 4.2.8 and 40 CFR 60.46b(e), that exceeds the applicable emission limits in Condition Nos. 3.2.10.b and 3.2.10.c.
[40 CFR 60.49b(h)(4)]
 - ii. Any 30-day rolling period during which the average NO_x emission rate from the No. 10 Boiler (Source Code P010), measured and recorded in accordance with Condition No. 5.2.1.b, is in excess of 0.046 lb/MMBtu.
[Avoidance of 40 CFR Part 52.21]
 - iii. Any 30-day rolling period during which the average CO emission rate from the No. 10 Boiler (Source Code P010), measured and recorded in accordance with Condition No. 5.2.1.c, is in excess of 0.170 lb/MMBtu.
[Avoidance of 40 CFR Part 52.21]
 - b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
 - i. Any determination of the process production weight of pale wood rosin to all extractors in Source Groups EBG1 and EXG2 exceeds 12.5 million pounds per month.
 - ii. Any period of time in which the combined total steam production from the No. 9 and No. 10 Boilers (Source Codes P009 & P010) is greater than or equal to 1,160,739 tons per twelve-consecutive months.
 - iii. Any determination that the sulfur content of the fuel oil burned in the Terpene Hot Oil Heater (Source Code TR08) is in excess of 1 % Sulfur, by weight.
 - iv. Any determination that the sulfur content of the fuel oil burned in the SCP Resins Dowtherm Boiler (Source Code SP06), Terpene Resins Hot Oil Heater (Source Code TR08), or the Liquid Resins Xceltherm Vaporizer (Source Code LR02) is in excess of 0.5 % Sulfur, by weight.

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- v. Any determination that the sulfur content of the fuel oil burned in the Liquid Resins Xceltherm vaporizer (Source Code LR02) is in excess of 2.5 % Sulfur, by weight.
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
 - i. Extraction/Refinery
 - (A) Any 24-hour period during which the average Scrubbant Flow to Oil Scrubber (Source Code EBC1) for the Old Extractor Group (Source Code EBG1) less than 5 gpm.
 - (B) Any 24-hour period during which the average pressure drop across the Oil Scrubber (Source Code EBC1) for the Old Extractor Group (Source Code EBG1) is indicative of operating outside normal operations (currently normal operation are considered greater than 3 inches of water column).
 - (C) Any 24-hour period during which the average water flow to the Old Extractor Spray Tower # 1 (Source Code EBC4) for the Old Extractor Group (Source Code EBG1) is less than 6 gpm.
 - (D) Any 24-hour period during which the average Scrubbant Flow to the Crown Oil Scrubber (Source Code EAC1) for the Crown Extractor Group (Source Code EXG1) is less than 5 gpm.
 - (E) Any 24-hour period during which the average Gas Phase Pressure Loss across the Crown Oil Scrubber (Source Code EAC1) for the Crown Extractor Group (Source Code EXG1) is greater than 4 inches water column.
 - (F) Any three consecutive 1-hour periods during which the average cooling water flow to the Crown Area Spray Tower (Source Code EAC3) for the Crown Extractor Group (Source Code EXG1) is less than 2 gpm. Alternatively, during periods when chilled waters is not available, any 24-hour average, (or average over the applicable portion of that calendar day), that the water flow is less than 6 gpm.
 - (G) Any 24-hour period during which the average Crown Head Space Temperature is above 165°F.
 - (H) Any three consecutive 1-hour periods during which the average Dome Pressure of the Desolventizer in the Crown Extractor Group (Source Code EXG1) is more than 2.5 psig.
 - (I) Any three consecutive 1-hour periods during which the wood hopper level is less than 40% while the slide gate is open.

- (J) Any time no corrective action is taken within two hours of the discovery of an interruption in wood feed to the extractor.
- (K) Any time no corrective LDAR action was taken within 8 hours of the discovery of MIBK concentration greater than 1000 ppm.
- (L) Any determination that any leak has not been repaired in accordance with the leak detection and repair program.

ii. Pexite Plant

- (A) Any 24-hour period during which the average Recirculation Flowrate of the scrubbant from the Pexite Water Spray Tower (Source Code PXC0) for the Pexite Refining Process (Source Code PXG1) is less than 5 gpm.
- (B) Any 24-hour period during which the average Corvus Oil Flow Rate from the Pexite Plant Packed Tower Scrubber (Source Code PXC1) for the Pexite Refining Process (Source Code PXG1) is less than 3 gpm.
- (C) Any 24-hour period during which the average Temperature of the vent gas from the Pexite Plant Packed Tower Scrubber (Source Code PXC1) for the Pexite Refining Process (Source Code PXG1) is greater than 50°C.
- (D) Any determination that any leak has not been repaired in accordance with the leak detection and repair program.

iii. Vinsol Area

- (A) Any daily determination during which the average Differential Pressure across any Dust Collector (Source Codes VC01 – VC04) for the Vinsol Bagging Process (Source Code VG01) is greater than 10 inches water column.
- (B) For the Vinsol Bagging Dust Collectors (Source Codes VC01 – VC04) any two consecutive required daily determinations of visible emissions from the same source for which visible emissions are present.

iv. Terpene Resins

- (A) Any 24-hour period during which the average Temperature of the uncondensed gas stream exiting the Wash System Condenser (TRC2) for the Terpene Resins Reactors (Source Code TR02) is greater than 65°C.
- (B) Any 24-hour period during which the average uncondensed gas stream exiting Condenser E26 (TRC4) for the Terpene Resins Lochem Filter (Source Code TR04) is greater than 65°C.

- (C) Any 24-hour period during which the average uncondensed gas stream exiting the Jet After-Condenser (TRC7) for the Terpene Resins LTC Evaporation System (Source Code TR07) is greater than 65°C.
- (D) Any 24-hour period during which the average Temperature of the uncondensed gas stream exiting the Dechlor Condenser (Source Code TRC3) for the Terpene Resins Dechlorinators (Source Code TR03) is greater than 65°C.
- (E) Any 24-hour period, or portion of each calendar day when in use, during which the average Temperature of the uncondensed gas stream exiting the Spare Condenser (Source Code TRC8) for the Terpene Resins LTC Evaporation System (Source Code TR07) is greater than 65°C.
- (F) Any determination that any leak has not been repaired in accordance with the leak detection and repair program.

v. Staybelite/Foral Area

- (A) Any eight hour period during which the average Temperature of the uncondensed gas stream from the Primary Condenser (Source Code SAC4) for the Staybelite Still (Source Code SA04) greater than 193°C.
- (B) Any three consecutive 1-hour averages for which the average Scrubbant Flow Rate for the Scrubber (Source Code SAC3) for the Staybelite & Foral Resin Reactors (Source Code SAG1) less than 5 gpm.
- (C) Any three consecutive 1-hour averages for which the average Scrubbant Makeup Flow Rate for the Packed Tower Scrubber (Source Code SAC3) for the Staybelite & Foral Resin Reactors (Source Code SAG1) is less than 0.5 gpm.

vi. Hard Resins Area

- (A) Any daily determination during which the average Pressure Drop across Hard Resins Baghouses HRC7, HRC8 and HRC9 is greater than 10 inches water column.
- (B) For the Hard Resin Area Baghouses HRC7, HRC8 and HRC9, any two consecutive required daily determinations of visible emissions from the same source for which visible emissions are present.
- (C) Any three consecutive 1-hour periods during which the average Pressure Drop across the Hard Resins Venturi Scrubber (Source Code HRVS) is less than 10 inches water column.

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- (D) Any 24-hour period during which the average temperature of the Hard Resins Thermal Oxidizer (Source Code HRT0) less than 1575°F, or the most recent temperature established through subsequent performance testing and approved by the Division.
[391-3-1-.02(2)(a)(2) & Georgia Air Toxics Guidelines]
- (E) Any determination that any leak has not been repaired in accordance with the leak detection and repair program.

vii. Liquid Resins/Specialty Chemical Processing (SCP)

- (A) Any eight hour period during which the average Inlet Supply Pressure to the Spray Tower (Source Code SPC1) for the SCP Ester Kettle R-403 (Source Code SP01) is less than 1 psig.
- (B) Any eight hour period during which the average Temperature of the gas stream exiting the Spray Tower (Source Code SPC1) for the SCP Ester Kettle R-403 (Source Code SP01) is greater than 49° Celsius, or the most recent approved value.
- (C) Any 24-hour period during which the average Scrubbant Flow Rate of the Venturi Scrubber (Source Code LRC1) for the Liquid Resins Stills & Towers (Source Code LRG1) is less than 18 gpm.
- (D) Any 24-hour period during which the average Make Up Flow Rate of the Venturi Scrubber (Source Code LRC1) for the Liquid Resins Stills & Towers (Source Code LRG1) is less than 0.5 gpm.
- (E) Any 24-hour period during which the average Scrubbant Flow Rate of the Packed Tower Scrubber (Source Code LRC2) for the Liquid Resins Stills & Towers (Source Code LRG1) is less than 3 gpm.
- (F) Any 24-hour period during which the average Make Up Flow Rate of the Packed Tower Scrubber (Source Code LRC2) for the Liquid Resins Stills & Towers (Source Code LRG1) is less than 0.5 gpm.
- (G) Any determination that any leak has not been repaired in accordance with the leak detection and repair program.

viii. Distillation and Chemical Plant

- (A) Any daily average temperature of the vent gas stream exiting the Condenser (Source Code SC40) for the Stillhouse Batch Stills & Continuous Distillation Columns (Source Code SHG1) that is greater than 45°C. For the purposes of this condition, a “daily average” is defined as the 24-hour period from 12 am to 12 am (or other 24-hour period agreed upon by the Permittee and the Division).

ix. Power Plant Operations

- (A) Any 30-day rolling average during which the Pressure Drop across the Venturi Scrubber (Source Code PC9B) for the No. 9 Boiler (Source Code P009) is less than 14.0 inches water column, or the value established by subsequent performance testing under Condition 4.2.6.
[40 CFR 63.7525(a) and Table 4, item 1 of 40 CFR 63 Subpart DDDDD]
 - (B) Any 30-day rolling average during which the Scrubbant Flow Rate of the Venturi Scrubber (Source Code PC9B) for the No. 9 Boiler (Source Code P009) is less than 1,100 gpm, or the value established by subsequent performance testing under Condition 4.2.6.
[40 CFR 63.7525(a) and Table 4, item 1 of 40 CFR 63 Subpart DDDDD]
 - (C) Any 30-day rolling average oxygen concentration for the No. 9 Boiler (Source Code P009) that is below 4.69%, or below the minimum value determined during the most recent performance test required in Condition 4.2.6.
[40 CFR 63.7525(a) and Table 4, item 8 of 40 CFR 63 Subpart DDDDD]
 - (D) Any 30-day rolling average during which the operating load of the No. 9 Boiler (Source Code P009) recorded in accordance with Condition 5.2.2 exceeds 221.4 pounds per hour, or 110% of the value established during the most recent 40 CFR 63 Subpart DDDDD performance test.
[40 CFR 63.7525(a) and Table 4, item 7 of 40 CFR 63 Subpart DDDDD]
- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:
- i. Copies of the fuel receipts from the fuel supplier which certify that the oil to be burned in the No. 9 Boiler, Liquid Resin Xceltherm Vaporizer, Terpene resin hot oil heater and SCP reactor Dowtherm Heater meets the oil sulfur content requirement defined in Conditions 3.4.4, 3.4.10, 3.5.2, 3.5.4, and 3.5.5
[40 CFR 60 Subpart Db, 391-3-1-.02(2)(g), 391-3-1-.02(2)(a)(3)]
 - ii. Monthly total process production weight of pale wood rosin to all extractors in Source Groups EBG1 and EXG2 for each calendar month during the reporting period.
 - iii. The 12-month rolling total of natural gas burned in the No. 10 Boiler (Source Code P010) for each calendar month during the reporting period.
 - iv. The 12-month rolling total of steam production from the No. 9 and No. 10 Boilers (Source Codes P009 and P010) for each calendar month during the reporting period.

- v. The No. 10 Boiler (Source Code P010) steam generating unit operating day records required to be maintained by Condition 6.2.25.
[40 CFR 60.49b(i)]
- vi. Any periods during which emission unit TEG2 was operated in accordance with the alternative operating scenario specified in Condition 3.3.9.b.
[40 CFR 63.2470]
- vii. Any periods during which Methanol Loading Rack was operated in accordance with the alternative operating scenario specified in Condition 3.3.14.b.
[40 CFR 63.2475]

40 CFR 63 Subpart DDDDD

- 6.1.8 For any performance test to be conducted in accordance with 40 CFR 63 Subpart DDDDD, the Permittee shall submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin.
[40 CFR 63.7545(d)]
- 6.1.9 The Permittee shall submit a Notification of Compliance Status to the Division for the No. 9 Boiler (Source Code P009) and the No. 10 Boiler (Source Code P010). The Notification of Compliance Status shall be submitted before the close of business on the 60th day following the completion of the initial compliance demonstration according to 40 CFR 63.10(d)(2). The Notification of Compliance Status report must contain all the information specified in 40 CFR 63.7545(e)(1) through (8), as applicable.
[40 CFR 63.9(h)(2)(ii) and 40 CFR 63.7545(e)]
- 6.1.10 For 40 CFR 63 Subpart DDDDD, the Permittee shall submit periodic reports as specified in 40 CFR 63.7550 and Table 9 of 40 CFR 63 Subpart DDDDD for each semiannual period ending June 30 and December 31 of each year for the operation of the No. 9 Boiler (Source Code P009) and the No. 10 Boiler (Source Code P010). All reports shall be postmarked by August 29 and February 28, respectively, following each reporting period. The reports shall contain the following:
[40 CFR 63.7550]
 - a. Information required in 40 CFR 63.7550(c)(1) through (5);
 - b. If there are no deviations from any emission limitation (emission limit and operating limit) that applies and there are no deviations from the requirements for work practice standards in Table 3 of 40 CFR 63 Subpart DDDDD that apply, a statement that there were no deviations from the emission limitations and work practice standards during the reporting period. If there were no periods during which the CMSs, including continuous emissions monitoring system and continuous opacity monitoring system, were out-of-control as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMSs were out-of-control during the reporting period;

- c. If there is a deviation from any emission limitation (emission limit and operating limit) where a CMS is not used to comply with that emission limit or operating limit, or a deviation from a work practice standard during the reporting period, the report must contain the information in 40 CFR 63.7550(d); and
 - d. If there were periods during which the CMSs, including continuous emissions monitoring system and continuous opacity monitoring system were out-of-control as specified in 40 CFR 63.8(c)(7), or otherwise not operating, the report must contain the information in 40 CFR 63.7550(e)
- 6.1.11 For 40 CFR 63 Subpart DDDDD, the Permittee shall maintain the following records for the operation of the No. 9 Boiler (Source Code P009).
[40 CFR 63.7555]
- a. A copy of each notification and report submitted by the Permittee to comply with 40 CFR 63 Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance reports, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
 - b. Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).
 - c. For each CEMS and continuous monitoring system, the Permittee must keep the applicable records in 40 CFR 63.7555(b)(1) through (5).
 - d. Records required in Table 8 of 40 CFR 63 Subpart DDDDD including records of all monitoring data and calculated averages for applicable operating limits, such as opacity, pressure drop, pH, and operating load, to show continuous compliance with each emission limit and operating limit.
 - e. Applicable records in 40 CFR 63.7555(d)(1) through (13).
 - f. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
 - g. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.7500(a)(3), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
 - h. Records of the calendar date, time, occurrence and duration of each startup and shutdown.
 - i. Records of the type(s) and amount(s) of fuels used during each startup and shutdown.
 - j. For units using paragraph (2) of the definition of “startup” in 40 CFR 63.7575, records required by 40 CFR 63.7555(d)(11-13).
 - k. If the Permittee elects to use emissions averaging or efficiency credits, records required by 40 CFR 63.7555(e) and (f) are required to be maintained.

- 6.1.12 For 40 CFR 63 Subpart DDDDD, the Permittee shall maintain records as follows:
- a. Records shall be in a form suitable and readily available for expeditious review.
[40 CFR 63.10(b)(1) and 40 CFR 63.7560(a)]
 - b. Records shall be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
[40 CFR 63.10(b)(1) and 40 CFR 63.7560(b)]
 - c. Each record shall be kept on site, or they must be accessible from on-site (for example, through a computer network), for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The Permittee can keep the records off site for the remaining three years.
[40 CFR 63.10(b)(1) and 40 CFR 63.7560(c)]
- 6.1.13 For 40 CFR 63 Subpart DDDDD, the Permittee shall maintain the following records of operation of the No. 10 Boiler (Source Code P010).
[40 CR 63.7555]
- a. A copy of each notification and report submitted by the Permittee to comply with 40 CFR 63 Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance reports, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
 - b. Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).
 - c. For a unit in the units designed to burn gas 1 subcategory that is subject to 40 CFR 63 Subpart DDDDD, and an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under 40 CFR Part 63, other gas 1 fuel, or gaseous fuel subject to another subpart of 40 CFR Part 63, or Part 60, 61, or 65 is used, the Permittee must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies.

6.2 Specific Record Keeping and Reporting Requirements

Extraction/Refinery

- 6.2.1 The Permittee shall maintain monthly records of the process production weight of pale wood rosin to all extractors in Source Groups EBG1 and EXG1. All calculations used to figure production should be kept as part of the monthly records. These production records shall be maintained and available for inspection by the Division for at least five years from the date of entry.
[40 CFR 52.21 Avoidance]

Power Plant Operations & Other Fuel Burning Sources

- 6.2.2 The Permittee shall maintain monthly records of the amount (including total weight of all materials), type of each fuel and sulfur content of each fuel being fired in the No. 9 Boiler, and No. 10 Boiler (Source Code P009 & P010).
[PSD Avoidance & 391-3-1-.02(6)(b)1]
- 6.2.3 For each shipment of fuel oil received (residual oil, reprocessed oil or used oil), the Permittee shall obtain a sample from the shipment using the procedures of ASTM D-4057 "*Standard Practice for Manual Sampling of Petroleum and Petroleum Products.*" The sample shall be analyzed for sulfur content (percent by weight) using the procedures of ASTM D-1552 "*Standard Test Method for Sulfur in Petroleum Products; High-Temperature Method,*" or obtain a certification of analysis from the fuel supplier.
[40 CFR 70.6(a)(3)(i) and 391-3-1-.02(6)(b)1]
- 6.2.4 For each shipment of No. 2 fuel oil received, the Permittee shall obtain a fuel supplier certification from the supplier. The fuel supplier certification shall contain the name of the supplier and a statement that the oil complies with the specifications for fuel oil numbers 1 and 2 as defined in ASTM D396.
[391-3-1-.02(6)(b)1 , 40 CFR 60 Subpart Db]
- 6.2.5 The Permittee shall maintain records of the following information for the No. 10 Boiler (Source Code P010), for each steam generating unit operating day:
[40 CFR 60 Subpart Db]
- a. Calendar date.
 - b. The daily hours of operation.
 - c. The type and amount of fuel used.
- 6.2.6 The Permittee shall record and maintain records of daily and monthly steam production rates for the No. 9 and No. 10 Boilers (Source Codes P009 & P010). This information shall be recorded in a permanent form suitable and available for inspection.
[PSD Avoidance, 391-3-1-.02(6)(b)1]
- 6.2.7 The Permittee shall maintain a record of all actions taken to suppress fugitive dust from roads, storage piles, or any other source of fugitive dust. Such records shall include the date and time of occurrence of actions taken.
[391-3-1-.02(6)(b)1]
- 6.2.8 The Permittee shall maintain a record of all leaks and subsequent repairs for the leak detection and repair program for Condition 3.3.5.
[40 CFR 60 Subpart VV, 391-3-1-.02(6)(b)1]

40 CFR 63 Subpart FFFF

- 6.2.9 The Permittee shall comply with the following requirements for the operation of cooling tower water systems subject to the provisions of 40 CFR 63 Subpart FFFF.
[40 CFR 63 Subpart FFFF; 40 CFR 63.2490; 40 CFR 63.104]
- a. The Permittee shall retain the following records as specified in 40 CFR 63.103(c)(1).
[40 CFR 63.104(f)]
 - i. Monitoring data required by 40 CFR 63.104 indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination;
[40 CFR 63.104(f)(1)(i)]
 - ii. The dates of efforts to repair leaks; and
[40 CFR 63.104(f)(1)(iii)]
 - iii. The method or procedure used to confirm repair of a leak and the date repair was confirmed.
[40 CFR 63.104(f)(1)(iv)]
 - b. If the Permittee invokes the delay of repair provisions, the following information shall be submitted in the next semi-annual periodic report. If the leak remains unrepaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported.
[40 CFR 63.104(f)(2)]
 - i. The Permittee shall report the presence of the leak and the date that the leak was detected.
[40 CFR 63.104(f)(2)(i)]
 - ii. The Permittee shall report whether or not the leak has been repaired.
[40 CFR 63.104(f)(2)(ii)]
 - iii. The Permittee shall report the reason(s) for delay of repair. If delay of repair is invoked due to the reasons described in 40 CFR 63.104(e)(2), documentation of emissions estimates must also be submitted.
[40 CFR 63.104(f)(2)(iii)]
 - iv. If the leak remains unrepaired, the Permittee shall report the expected date of repair.
[40 CFR 63.104(f)(2)(iv)]
 - v. If the leak is repaired, the Permittee shall report the date the leak was successfully repaired.
[40 CFR 63.104(f)(2)(v)]

- 6.2.10 The Permittee shall submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), and 63.9(b) through (h) that apply to the facility under to provisions of 40 CFR 63 Subpart FFFF and any notification required by 40 CFR 63.2515(c) (notification of performance test)..
[40 CFR 63 Subpart FFFF; 40 CFR 63.2515(a) and (c)]
- 6.2.11 For the pressure relief devices subject to the pressure release management work practice standards in 40 CFR 63.2480(e)(3) and Condition 3.3.33, the Permittee must submit the following information in a supplement to the Notification of Compliance Status within 150 days after the August 12, 2023 compliance date for pressure relief device monitoring:
[40 CFR 63.2520(d)(4)]
- a. A description of the monitoring system to be implemented, including the relief devices and process parameters to be monitored, and a description of the alarms or other methods by which operators will be notified of a pressure release.
 - b. A description of the prevention measures to be implemented for each affected pressure relief device.
- 6.2.12 The Permittee shall submit semiannual compliance reports as specified in 40 CFR 63.2450(m) and 40 CFR 63.2520(b) and (e). Compliance reports shall cover each 6-month semiannual calendar periods and be postmarked or delivered no later than August 31 or February 28, whichever date is the first date following the end of the semiannual reporting period. On and after August 12, 2023, or once the reporting template for 40 CFR 63 Subpart FFFF has been available on the CEDRI website for one year, whichever date is later, all subsequent reports shall also go to the EPA via CEDRI. The compliance report must contain the following information.
[40 CFR 63 Subpart FFFF; 40 CFR 63.2520(b) and (e)]
- a. Company name and address.
[40 CFR 63.2520(e)(1)]
 - b. Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
[40 CFR 63.2520(e)(2)]
 - c. Date of report and beginning and ending dates of the reporting period.
[40 CFR 63.2520(e)(3)]
 - d. For each SSM during which excess emissions occur, the compliance report must include records that the procedures specified in the Permittee's startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP, and include a brief description of each malfunction.
[40 CFR 63.2520(e)(4)]
 - e. The compliance report must contain the information on deviations, as defined in 40 CFR 63.2550, according to the following paragraphs.
[40 CFR 63.2520(e)(5)]

- i. If there are no deviations from any emission limit, operating limit or work practice standard specified in 40 CFR 63 Subpart FFFF, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.
[40 CFR 63.2520(e)(5)(i)]
- ii. For each deviation from an emission limit, operating limit, and work practice standard that occurs at an affected source where the Permittee is not using a continuous monitoring system (CMS) to comply with the emission limit or work practice standard in 40 CFR 63 Subpart FFFF, the Permittee must include the information in the following paragraphs. This includes periods of SSM.
[40 CFR 63.2520(e)(5)(ii)]
 - (A) The total operating time of the affected source during the reporting period.
[40 CFR 63.2520(e)(5)(ii)(A)]
 - (B) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
[40 CFR 63.2520(e)(5)(ii)(B)]
 - (C) Operating logs of processes with batch vents from batch operations for the day(s) during which the deviation occurred, except operating logs are not required for deviations of the work practice standards for equipment leaks.
[40 CFR 63.2520(e)(5)(ii)(C)]
 - (D) Beginning no later than August 12, 2023, paragraph (e)(ii)(B) of this condition no longer applies. Instead, report information for each deviation to meet an applicable standard. For each instance, report the start date, start time, and duration in hours of each deviation. For each deviation, the report must include a list of the affected sources or equipment, an estimate of the quantity in pounds of each regulated pollutant emitted over any emission limit, a description of the method used to estimate the emissions, the cause of the deviation (including unknown cause, if applicable), as applicable, and the corrective action taken.
[40 CFR 63.2520(e)(5)(ii)(D)]
- iii. For each deviation from an emission limit or operating limit occurring at an affected source where the Permittee is using a CMS to comply with an emission limit in 40 CFR 63 Subpart FFFF, the Permittee must include the information in the following paragraphs. This includes periods of SSM.
[40 CFR 63.2520(e)(5)(iii)]
 - (A) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.
[40 CFR 63.2520(e)(5)(iii)(A)]

- (B) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.
[40 CFR 63.2520(e)(5)(iii)(C)]
- (C) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total operating time of the affected source during that reporting period.
[40 CFR 63.2520(e)(5)(iii)(D)]
- (D) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
[40 CFR 63.2520(e)(5)(iii)(E)]
- (E) A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the affected source during that reporting period.
[40 CFR 63.2520(e)(5)(iii)(F)]
- (F) An identification of each HAP that is known to be in the emission stream.
[40 CFR 63.2520(e)(5)(iii)(G)]
- (G) A brief description of the process units.
[40 CFR 63.2520(e)(5)(iii)(H)]
- (H) A brief description of the CMS.
[40 CFR 63.2520(e)(5)(iii)(I)]
- (I) The date of the latest CMS certification or audit.
[40 CFR 63.2520(e)(5)(iii)(J)]
- (J) Operating logs of processes with batch vents from batch operations for each day(s) during which the deviation occurred.
[40 CFR 63.2520(e)(5)(iii)(K)]
- (K) The operating day or operating block average values of monitored parameters for each day(s) during which the deviation occurred.
[40 CFR 63.2520(e)(5)(iii)(L)]
- (L) Beginning no later than August 12, 2023, paragraph (e)(iii)(B) of this condition no longer applies. Instead, report the number of deviations to meet an applicable standard. For each instance, report the start date, start time and duration in hours of each deviation. For each deviation, the report must include a list of the affected sources or equipment, an estimate of the quantity in pounds of each regulated pollutant emitted over any emission limit, a description of the method used to estimate the emissions,

and the cause of the deviation (including unknown cause, if applicable), as applicable, and the corrective action taken.

[40 CFR 63.2520(e)(5)(iii)(M)]

- (M) Beginning no later than August 12, 2023, paragraph (e)(iii)(D) of this condition no longer applies. Instead, report a breakdown of the total duration in hours of the deviations during the operating period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.

[40 CFR 63.2520(e)(5)(iii)(N)]

- iv. If the Permittee documented in the notification of compliance status report that an MCPU has Group 2 batch process vents because the non-reactive HAP is the only HAP and usage is less than 10,000 lb/yr, the total uncontrolled organic HAP emissions from the batch process vents in an MCPU will be less than 1,000 lb/yr for the anticipated number of standard batches, or total uncontrolled hydrogen halide and halogen HAP emissions from all batch process vents and continuous process vents in a process are less than 1,000 lb/yr, include the records associated with each calculation required by 40 CFR 63.2525(e) that exceeds an applicable HAP usage or emissions threshold.
[40 CFR 63.2520(e)(5)(iv)]
- f. Include each new operating scenario which has been operated since the time period covered by the last compliance report and has not been submitted in the notification of compliance status report or a previous compliance report. For each new operating scenario, the Permittee must provide verification that the operating conditions for any associated control or treatment device have not been exceeded and that any required calculations and engineering analyses have been performed. For the purposes of this paragraph, a revised operating scenario for an existing process is considered to be a new operating scenario.
[40 CFR 63.2520(e)(7)]
- g. Records of process units added to a PUG as specified in 40 CFR 63.2525(i)(4) and records of primary product redeterminations as specified in 40 CFR 63.2525(i)(5).
[40 CFR 63.2520(e)(8)]
- h. Applicable records and information for periodic reports as specified in referenced Subparts H, SS, and UU of this 40 CFR Part 63.
[40 CFR 63.2520(e)(9)]
- i. Notification of process change as described in 40 CFR 63.2520(e)(10).
[40 CFR 63.2520(e)(10)]
- j. Beginning August 12, 2023, for bypass lines subject to the requirements of 40 CFR 63.2450(e)(6) and Condition 3.3.21, the compliance report must include the start date, start time, duration in hours, estimate of the volume of gas in standard cubic feet, the concentration of organic HAP in the gas in parts per million by volume and the resulting mass emissions of organic HAP in pounds that bypass a control device.

For periods when the flow indicator is not operating, report the start date, start time, and duration in hours.

[40 CFR 63.2520(e)(12)]

- k. Beginning August 12, 2023, for any maintenance vent release exceeding the applicable limits in 40 CFR 63.2450(v)(1) Condition 3.3.22, the compliance report must include the information specified in sections (k)(i) through (iv) below. For the purposes of this reporting requirement, if complying with section (iv), the Permittee must report each venting event conducted under those provisions and include an explanation for each event as to why utilization of this alternative was required.
[40 CFR 63.2520(e)(14)]
 - i. Identification of the maintenance vent and the equipment served by the maintenance vent.
 - ii. The date and time the maintenance vent was opened to the atmosphere.
 - iii. The lower explosive limit in percent, vessel pressure in psig, or mass in pounds of VOC in the equipment, as applicable, at the start of atmospheric venting. If the 5 psig vessel pressure option in section 40 CFR 63.2450(v)(1)(ii) and Condition 3.3.22(a)(ii) was used and active purging was initiated while the lower explosive limit was 10% or greater, also include the lower explosive limit of the vapors at the time active purging was initiated.
 - iv. An estimate of the mass in pounds of organic HAP released during the entire atmospheric venting event.
- l. Beginning August 12, 2023, compliance reports for pressure relief devices subject to the requirements of 40 CFR 63.2480(e) and Condition 3.3.33(d) must include the information specified in paragraphs l(i) – l(iii) of this condition, below.
[40 CFR 63.2520(e)(15)]
 - i. For pressure relief devices in organic HAP gas or vapor service, pursuant to 40 CFR 63.2480(e)(1), report the instrument readings and dates for all readings of 500 ppmv or greater.
 - ii. For pressure relief devices in organic HAP gas or vapor service subject to 40 CFR 63.2480(e)(2), report the instrument readings and dates of instrument monitoring conducted.
 - iii. For pressure relief devices in organic HAP service subject to 40 CFR 63.2480(e)(3), report each pressure release to the atmosphere, including the start date, start time, and duration in minutes of the pressure release and an estimate of the mass quantity in pounds of each organic HAP released; the results of any root cause analysis and corrective action analysis completed during the reporting period; and, if applicable, the implementation schedule for planned corrective actions to be implemented subsequent to the reporting period.

- m. Beginning August 12, 2023, for each heat exchange system subject to 40 CFR 63.2490(d) and Condition 5.2.10(d), the reporting requirements of 40 CFR 63.104(f)(2) no longer apply; instead, the compliance report must include the information specified in paragraphs (m)(i) through (m)(v) below.
[40 CFR 63.2520(e)(16)]
 - i. The number of heat exchange systems at the plant site subject to the monitoring requirements in 40 CFR 63.2490(d) during the reporting period;
 - ii. The number of heat exchange systems subject to the monitoring requirements in 40 CFR 63.2490(d) at the plant site found to be leaking during the reporting period;
 - iii. For each monitoring location where the total strippable hydrocarbon concentration or total hydrocarbon mass emissions rate was determined to be equal to or greater than applicable leak definitions specified in 40 CFR 63.2490(d)(1)(v) during the reporting period, identification of the monitoring location (e.g., unique monitoring location or heat exchange system ID number), the measured total strippable hydrocarbon concentration or total hydrocarbon mass emissions rate, the date the leak was first identified, and, if applicable, the date the source of the leak was identified;
 - iv. For leaks that were repaired during the reporting period (including delayed repairs), identification of the monitoring location associated with the repaired leak, the total strippable hydrocarbon concentration or total hydrocarbon mass emissions rate measured during re-monitoring to verify repair, and the re-monitoring date (i.e., the effective date of repair); and
 - v. For each delayed repair, identification of the monitoring location associated with the leak for which repair is delayed, the date when the delay of repair began, the date the repair is expected to be completed (if the leak is not repaired during the reporting period), the total strippable hydrocarbon concentration or total hydrocarbon mass emissions rate and date of each monitoring event conducted on the delayed repair during the reporting period, and an estimate in pounds of the potential total hydrocarbon emissions over the reporting period associated with the delayed repair.
- 6.2.13 The Permittee shall maintain records as specified in 40 CFR 63.2525(a) through (t).
[40 CFR 63 Subpart FFFF; 40 CFR 63.2525(a) through (t)]
- a. Each applicable record required by 40 CFR 63 Subpart A and in referenced Subparts SS and UU of 40 CFR Part 63.
[40 CFR 63.2525(a)]
 - b. Records of each operating scenario as specified in the following paragraphs.
[40 CFR 63.2525(b)]

- i. A description of the process and the type of process equipment used.
[40 CFR 63.2525(b)(1)]
- ii. An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard in 40 CFR 63.2505; wastewater point of determination (POD); storage tanks; and transfer racks.
[40 CFR 63.2525(b)(2)]
- iii. The applicable control requirements of 40 CFR 63 Subpart FFFF, including the level of required control, and for vents, the level of control for each vent.
[40 CFR 63.2525(b)(3)]
- iv. The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device.
[40 CFR 63.2525(b)(4)]
- v. The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s).
[40 CFR 63.2525(b)(5)]
- vi. The applicable monitoring requirements of 40 CFR 63 Subpart FFFF and any parametric level that assures compliance for all emissions routed to the control device or treatment process.
[40 CFR 63.2525(b)(6)]
- vii. Calculations and engineering analyses required to demonstrate compliance.
[40 CFR 63.2525(b)(7)]
- viii. For reporting purposes, a change to any of these elements not previously reported, except for paragraph b.v. of this condition, constitutes a new operating scenario.
[40 CFR 63.2525(b)(8)]
- c. A schedule or log of operating scenarios for processes with batch vents from batch operations updated each time a different operating scenario is put into effect.
[40 CFR 63.2525(c)]
- d. The information specified in the following paragraphs for Group 1 batch process vents in compliance with a percent reduction emission limit in Table 2 of 40 CFR 63 Subpart FFFF if some of the vents are controlled to less the percent reduction requirement.
[40 CFR 63.2525(d)]
 - i. Records of whether each batch operated was considered a standard batch.
[40 CFR 63.2525(d)(1)]

- ii. The estimated uncontrolled and controlled emissions for each batch that is considered to be a nonstandard batch.
[40 CFR 63.2525(d)(2)]
- e. The information specified in paragraph e.ii., e.iii., or e.iv. of this condition, as applicable, for each process with Group 2 batch process vents or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. No records are required for situations described in paragraph e.i. of this condition.
[40 CFR 63.2525(e)]
 - i. No records are required if the Permittee documented in the Permittee's notification of compliance status report that the MCPU meets any of the situations described in paragraph e.i.A. or e.i.B. of this condition.
[40 CFR 63.2525(e)(1)]
 - (A) The MCPU does not process, use, or generate HAP.
[40 CFR 63.2525(e)(1)(i)]
 - (B) The Permittee controls the Group 2 batch process vents using a control device for which the Permittee's determination of worst case for initial compliance includes the contribution of all Group 2 batch process vents.
[40 CFR 63.2525(e)(1)(iii)]
 - ii. If the Permittee documented in the notification of compliance status report that an MCPU has Group 2 batch process vents because the non-reactive organic HAP is the only HAP and usage is less than 10,000 lb/yr, as specified in 40 CFR 63.2460(b)(7), the Permittee must keep records of the amount of HAP material used, and calculate the daily rolling annual sum of the amount used no less frequently than monthly. If a record indicates usage exceeds 10,000 lb/yr, the Permittee must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and the Permittee must begin recordkeeping as specified in paragraph e.iv. of this condition. After 1 year, the Permittee may revert to recording only usage if the usage during the year is less than 10,000 lb.
[40 CFR 63.2525(e)(2)]
 - iii. If the Permittee documented in the notification of compliance status report that total uncontrolled organic HAP emissions from the batch process vents in an MCPU will be less than 1,000 lb/yr for the anticipated number of standard batches, then the Permittee must keep records of the number of batches operated and calculate a daily rolling annual sum of batches operated no less frequently than monthly. If the number of batches operated results in organic HAP emissions that exceed 1,000 lb/yr, the Permittee must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and the Permittee must begin recordkeeping as specified in paragraph e.iv. of this condition. After 1 year, the Permittee may revert to recording only the number of batches if the number of

batches operated during the year results in less than 1,000 lb of organic HAP emissions.

[40 CFR 63.2525(e)(3)]

- iv. If the Permittee meets none of the conditions specified in paragraphs e.i. through e.iii. of this condition, the Permittee must keep records of the following information.

[40 CFR 63.2525(e)(4)]

- (A) A record of the day each batch was completed and/or the operating hours per day for continuous operations with hydrogen halide and halogen emissions.

[40 CFR 63.2525(e)(4)(i)]

- (B) A record of whether each batch operated was considered a standard batch.

[40 CFR 63.2525(e)(4)(ii)]

- (C) The estimated uncontrolled and controlled emissions for each batch that is considered to be a nonstandard batch.

[40 CFR 63.2525(e)(4)(iii)]

- (D) Records of the daily 365-day rolling summations of emissions, or alternative records that correlate to the emissions (e.g., number of batches), calculated no less frequently than monthly.

[40 CFR 63.2525(e)(4)(iv)]

- f. A record of each time a safety device is opened to avoid unsafe conditions in accordance with 40 CFR 63.2450(p). NOTE: Beginning August 12, 2023, 63.2450(p) will no longer apply and the Permittee must comply with the requirements specified in 63.2480(e).

[40 CFR 63.2525(f); 40 CFR 63.2450(t)]

- g. Records of the results of each CPMS calibration check and the maintenance performed, as specified in 40 CFR 63.2450(k)(1).

[40 CFR 63.2525(g)]

- h. In the SSMP required by 40 CFR 63.6(e)(3), the Permittee is not required to include Group 2 emission points, unless those emission points are used in an emissions average. For equipment leaks, the SSMP requirement is limited to control devices and is optional for other equipment. NOTE: On and after August 12, 2023, this paragraph (h) will no longer apply.

[40 CFR 63.2525(j)]

- i. On and after August 12, 2023, for each flow event from a bypass line subject to the requirements in 40 CFR 63.2450(e)(6), the Permittee must maintain records sufficient to determine whether or not the detected flow included flow requiring control. For each flow event from a bypass line requiring control that is released either directly to the atmosphere or to a control device not meeting the requirements specified in

Tables 1 through 7 of 40 CFR 63 Subpart FFFF, the Permittee must include an estimate of the volume of gas, the concentration of organic HAP in the gas and the resulting emissions of organic HAP that bypassed the control device using process knowledge and engineering estimates.

[40 CFR 63.2525(n)]

- j. On and after August 12, 2023, for each maintenance vent opening subject to the requirements in 40 CFR 63.2450(v) and Condition 3.3.22, the Permittee must keep the applicable records specified in paragraphs (j)(i) through (j)(v) below:

[40 CFR 63.2525(p)]

- i. The Permittee must maintain standard site procedures used to deinventory equipment for safety purposes (e.g., hot work or vessel entry procedures) to document the procedures used to meet the requirements in 40 CFR 63.2450(v). The current copy of the procedures must be retained and available on-site at all times. Previous versions of the standard site procedures, as applicable, must be retained for five years.
- ii. If complying with the requirements of 40 CFR 63.2450(v)(1)(i), and the lower explosive limit at the time of the vessel opening exceeds 10%, include the information specified in 40 CFR 63.2525(p)(2).
- iii. If complying with the requirements of 40 CFR 63.2450(v)(1)(ii), and either the vessel pressure at the time of vessel opening exceeds 5 psig or the lower explosive limit at the time of the active purging was initiated exceeds 10%, include the information specified in 40 CFR 63.2525(p)(3).
- iv. If complying with the requirements of 40 CFR 63.2450(v)(1)(iii), records of the estimating procedures used to determine the total quantity of VOC in the equipment and the additional information specified in 40 CFR 63.2525(p)(4).
- v. If complying with the requirements of paragraph (j)(iv) of this condition, include the additional information specified in 40 CFR 63.2525(p)(5).

- k. On and after August 12, 2023, for each pressure relief device subject to the pressure release management work practice standards in 40 CFR 63.2480(e), the Permittee must keep the records specified in paragraphs (k)(i) through (k)(iii) below.

[40 CFR 63.2525(q)]

- i. Records of the prevention measures implemented as required in 40 CFR 63.2480(e)(3)(ii).
- ii. Records of the number of releases during each calendar year and the number of those releases for which the root cause was determined to be a force majeure event. Keep these records for the current calendar year and the past 5 calendar years.

- iii. For each release to the atmosphere, the Permittee must keep the records specified in paragraphs (k)(iii)(A) through (k)(iii)(D) below:
 - (A) The start and end time and date of each pressure release to the atmosphere.
 - (B) Records of any data, assumptions, and calculations used to estimate of the mass quantity of each organic HAP released during the event.
 - (C) Records of the root cause analysis and corrective action analysis conducted as required in 40 CFR 63.2480(e)(3)(iii), including the information further specified in 40 CFR 63.2525(q)(3)(iii).
 - (D) For any corrective action analysis for which implementation of corrective actions are required in 40 CFR 63.2480(e)(7), a description of the corrective action(s) completed within the first 45 days following the discharge and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates.
- 1. On and after August 12, 2023, for each heat exchange system, the recordkeeping requirements of 40 CFR 60.104(f)(1) no longer apply; instead, the Permittee must keep the records in paragraphs (l)(i) through (l)(iv) below:
 - i. Monitoring data required by 63.2490(d) that indicate a leak, the date the leak was detected, or if applicable, the basis for determining there is no leak.
 - ii. The dates of efforts to repair leaks.
 - iii. The method or procedures used to confirm repair of a leak and the date the repair was confirmed.
 - iv. Documentation of delay of repair as specified in 40 CFR 63.2525(r)(4).

Group 2 Process Wastewater

- 6.2.14 For Group 2 wastewater streams complying with the provisions of 40 CFR 63.146 and 63.147, the Permittee shall keep the records below in a readily accessible location. The information shall also be submitted in any Notification of Compliance Status report required for the applicable equipment.
[40 CFR 63 Subpart FFFF; 40 CFR 63.146(b)(1) and 147(b)(8)]
- a. Process unit identification and description of the process unit.
 - b. Stream identification code.
 - c. Concentration of Tables 8 and 9 of 40 CFR 63 Subpart FFFF compound(s) in parts per million, by weight. Include documentation of the methodology used to determine concentration.

- d. Flow rate in liters per minute.

Maintenance Wastewater

- 6.2.15 The Permittee shall comply with the following for maintenance wastewaters containing those organic HAP listed in Tables 8 and 9 of 40 CFR 63 Subpart FFFF:
[40 CFR 63 Subpart FFFF; 40 CFR 63.105]
- a. The Permittee shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance). The descriptions shall:
[40 CFR 63.105(b)]
 - i. Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities.
[40 CFR 63.105(b)(1)]
 - ii. Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and
[40 CFR 63.105(b)(2)]
 - iii. Specify the procedures to be followed when clearing materials from process equipment.
[40 CFR 63.105(b)(3)]
 - b. The Permittee shall modify and update the information required by paragraph a. of this condition as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure.
[40 CFR 63.105(c)]
 - c. The Permittee shall incorporate the procedures described in paragraphs a. and b. of this condition as part of the startup, shutdown, and malfunction plan required under 40 CFR 63.6(e)(3).
[40 CFR 63.105(d)]
 - d. The Permittee shall maintain a record of the information required by paragraphs a. and b. of this condition as part of the start-up, shutdown, and malfunction plan required under 40 CFR 63.6(e)(3).
[40 CFR 63.105(e)]

40 CFR 63 Subpart SS Record Keeping and Reporting

- 6.2.16 The Permittee shall maintain the records described in 40 CFR 63.998(a) regarding compliance assessment, monitoring, and compliance records in accordance with 40 CFR 63 Subpart FFFF and 40 CFR 63 Subpart SS.
[40 CFR 63 Subpart FFFF; 40 CFR 63 Subpart SS; 40 CFR 63.998(a)]

6.2.17 The Permittee shall maintain the following records regarding continuous records and monitoring system data handling in accordance with 40 CFR 63 Subpart FFFF and 40 CFR 63 Subpart SS.

[40 CFR 63 Subpart FFFF; 40 CFR 63 Subpart SS; 40 CFR 63.998(b)]

a. Where 40 CFR 63 Subpart SS requires a continuous record, the Permittee shall maintain a record as specified in the following paragraphs, as applicable:

[40 CFR 63.998(b)(1)]

i. A record of values measured at least once every 15 minutes or each measured value for systems which measure more frequently than once every 15 minutes;
or

[40 CFR 63.998(b)(1)(i)]

ii. A record of block average values for 15-minute or shorter periods calculated from all measured data values during each period or from at least one measured data value per minute if measured more frequently than once per minute.

[40 CFR 63.998(b)(1)(ii)]

iii. Where data is collected from an automated continuous parameter monitoring system, the Permittee may calculate and retain block hourly average values from each 15-minute block average period or from at least one measured value per minute if measured more frequently than once per minute, and discard all but the most recent three valid hours of continuous (15-minute or shorter) records, if the hourly averages do not exclude periods of CPMS breakdown or malfunction. An automated CPMS records the measured data and calculates the hourly averages through the use of a computerized data acquisition system.

[40 CFR 63.998(b)(1)(iii)]

iv. A record as required by an alternative approved under a referencing subpart.

[40 CFR 63.998(b)(1)(iv)]

b. Monitoring data recorded during periods identified in the following paragraphs shall not be included in any average computed to determine compliance with an emission limit in a referencing subpart.

[40 CFR 63.998(b)(2)]

i. Monitoring system breakdowns, repairs, preventive maintenance, calibration checks, and zero (low-level) and high-level adjustments;

[40 CFR 63.998(b)(2)(i)]

ii. Periods of non-operation of the process unit (or portion thereof), resulting in cessation of the emissions to which the monitoring applies; and

[40 CFR 63.998(b)(2)(ii)]

- iii. Startups, shutdowns, and malfunctions, if the Permittee operates the source during such periods in accordance with 40 CFR 63.1111(a) and maintains the records specified in 40 CFR 63.998(d)(3). After August 12, 2023, this provision [6.2.16(b)(iii)] no longer applies when demonstrating compliance with 40 CFR 63 Subpart SS.
[40 CFR 63.998(b)(2)(iii) and 40 CFR 63.2450(e)(4)(viii)]
- c. In addition to the records specified in Condition 6.2.16, the Permittee shall keep records as specified in paragraphs c.i. and c.ii. of this condition and submit reports as specified in Condition 6.2.20, unless an alternative recordkeeping system has been requested and approved under a referencing subpart.
[40 CFR 63.998(b)(3)]
 - i. Except as specified in paragraph c.ii. of this condition, daily average values of each continuously monitored parameter shall be calculated from data meeting the specifications of paragraph b. of this condition for each operating day and retained for 5 years.
[40 CFR 63.998(b)(3)(i)]
 - (A) The daily average shall be calculated as the average of all values for a monitored parameter recorded during the operating day. The average shall cover a 24-hour period if operation is continuous, or the period of operation per operating day if operation is not continuous (e.g., for transfer racks the average shall cover periods of loading). If values are measured more frequently than once per minute, a single value for each minute may be used to calculate the daily average instead of all measured values.
[40 CFR 63.998(b)(3)(i)(A)]
 - (B) The operating day shall be the period defined in the operating permit or in the Notification of Compliance Status. It may be from midnight to midnight or another daily period.
[40 CFR 63.998(b)(3)(i)(B)]
 - ii. If all recorded values for a monitored parameter during an operating day are within the limit established in the Notification of Compliance Status or in the operating permit, the Permittee may record that all values were within the limit and retain this record for 5 years rather than calculating and recording a daily average for that operating day. In such cases, the Permittee may not discard the recorded values as allowed in paragraph a.iii. of this condition.
[40 CFR 63.998(b)(3)(ii)]

d. Excursions

[40 CFR 63.998(b)(6)]

- i. For the purposes of this paragraph, an excursion means that the daily average value of monitoring data for a parameter is greater than the maximum, or less than the minimum established value.

[40 CFR 63.998(b)(6)(i)]

6.2.18 The Permittee shall maintain the following records regarding monitoring in accordance with 40 CFR 63 Subpart FFFF and 40 CFR 63 Subpart SS.

[40 CFR 63 Subpart FFFF; 40 CFR 63 Subpart SS; 40 CFR 63.998(c)]

- a. For process vents, the Permittee shall keep the records specified in this condition, as well as records specified elsewhere in 40 CFR 63 Subpart SS.

[40 CFR 63.998(c)(1)]

- i. For a CPMS, a record of the procedure used for calibrating the CPMS.

[40 CFR 63.998(c)(1)(i)]

- ii. For a CPMS, records of the information specified in the following paragraphs, as indicated in a referencing subpart.

[40 CFR 63.998(c)(1)(ii)]

- (A) The date and time of completion of calibration and preventive maintenance of the CPMS.

[40 CFR 63.998(c)(1)(ii)(A)]

- (B) The “as found” and “as left” CPMS readings, whenever an adjustment is made that affects the CPMS reading and a “no adjustment” statement otherwise.

[40 CFR 63.998(c)(1)(ii)(B)]

- (C) The start time and duration or start and stop times of any periods when the CPMS is inoperative.

[40 CFR 63.998(c)(1)(ii)(C)]

- (D) Records of the occurrence and duration of each start-up, shutdown, and malfunction of CPMS used to comply with this subpart during which excess emissions (as defined in a referencing subpart) occur. After August 12, 2023, this provision [6.2.17(a)(ii)(D)] no longer applies when demonstrating compliance with 40 CFR 63 Subpart SS.

[40 CFR 63.998(c)(1)(ii)(D) and 40 CFR 63.2450(e)(4)(xv)]

- (E) For each start-up, shutdown, and malfunction during which excess emissions as defined in a referencing subpart occur, records whether the procedures specified in the source's start-up, shutdown, and malfunction plan were followed, and documentation of actions taken that are not consistent with the plan. These records may take the form of a

“checklist,” or other form of recordkeeping that confirms conformance with the start-up, shutdown, and malfunction plan for the event. After August 12, 2023, this provision [6.2.17(a)(ii)(E)] no longer applies when demonstrating compliance with 40 CFR 63 Subpart SS.

[40 CFR 63.998(c)(1)(ii)(E) and 40 CFR 63.2450(e)(4)(xv)]

(F) Records documenting each start-up, shutdown, and malfunction event. After August 12, 2023, this provision [6.2.17(a)(ii)(F)] no longer applies when demonstrating compliance with 40 CFR 63 Subpart SS.

[40 CFR 63.998(c)(1)(ii)(F) and 40 CFR 63.2450(e)(4)(xv)]

(G) Records of CPMS start-up, shutdown, and malfunction event that specify that there were no excess emissions during the event, as applicable. After August 12, 2023, this provision [6.2.17(a)(ii)(G)] no longer applies when demonstrating compliance with 40 CFR 63 Subpart SS.

[40 CFR 63.998(c)(1)(ii)(G) and 40 CFR 63.2450(e)(4)(xv)]

(H) Records of the total duration of operating time.

[40 CFR 63.998(c)(1)(ii)(H)]

b. Combustion control and halogen reduction device monitoring records.

[40 CFR 63.998(c)(2)]

i. The Permittee shall keep the following records up-to-date and readily accessible, as applicable for a combustion control or a halogen reduction device. Continuous records of the equipment operating parameters specified to be monitored under 40 CFR 63.988(c) (incinerator), and 63.994(c) (halogen reduction device monitoring) or approved by the Division in accordance with a referencing subpart.

[40 CFR 63.998(c)(2)(i)]

ii. The Permittee shall keep records of the daily average value of each continuously monitored parameter for each operating day determined according to the procedures specified in Condition 6.2.17.c.i.

[40 CFR 63.998(c)(2)(ii)]

iii. The Permittee shall keep up-to-date, readily accessible records of periods of operation during which the parameter boundaries are exceeded. The parameter boundaries are established pursuant to 40 CFR 63.996(c)(6).

[40 CFR 63.998(c)(2)(iii)]

6.2.19 The Permittee shall maintain the following records in accordance with 40 CFR 63 Subpart FFFF and 40 CFR 63 Subpart SS.

[40 CFR 63 Subpart FFFF; 40 CFR 63 Subpart SS; 40 CFR 63.998(d)]

a. For closed vent systems the Permittee shall record the information specified in the following paragraphs, as applicable.

[40 CFR 63.998(d)(1)]

- i. For closed vent systems collecting regulated material from a regulated source, the Permittee shall record the identification of all parts of the closed vent system, that are designated as unsafe or difficult to inspect, an explanation of why the equipment is unsafe or difficult to inspect, and the plan for inspecting the equipment required by Condition 3.3.23.b.ii.
[40 CFR 63.998(d)(1)(i)]
- ii. For each closed vent system that contains bypass lines that could divert a vent stream away from the control device and to the atmosphere, the Permittee shall keep a record of the information specified in either of the following paragraphs, as applicable.
[40 CFR 63.998(d)(1)(ii)]
 - (A) Hourly records of whether the flow indicator specified under Condition 3.3.23.a.iii.A. was operating and whether a diversion was detected at any time during the hour, as well as records of the times of all periods when the vent stream is diverted from the control device or the flow indicator is not operating.
[40 CFR 63.998(d)(1)(ii)(A)]
 - (B) Where a seal mechanism is used to comply with Condition 3.3.23.a.iii.B., hourly records of flow are not required. In such cases, the Permittee shall record that the monthly visual inspection of the seals or closure mechanisms has been done, and shall record the occurrence of all periods when the seal mechanism is broken, the bypass line valve position has changed, or the key for a lock-and-key type lock has been checked out, and records of any car-seal that has been broken.
[40 CFR 63.998(d)(1)(ii)(B)]
- iii. For a closed vent system collecting regulated material from a regulated source, when a leak is detected as specified in Condition 3.3.23.c.ii., the information specified in the following paragraphs shall be recorded and kept for 5 years.
[40 CFR 63.998(d)(1)(iii)]
 - (A) The instrument and the equipment identification number and the operator name, initials, or identification number.
[40 CFR 63.998(d)(1)(iii)(A)]
 - (B) The date the leak was detected and the date of the first attempt to repair the leak.
[40 CFR 63.998(d)(1)(iii)(B)]
 - (C) The date of successful repair of the leak.
[40 CFR 63.998(d)(1)(iii)(C)]

- (D) The maximum instrument reading measured by the procedures in Condition 4.2.3 after the leak is successfully repaired or determined to be nonrepairable.
[40 CFR 63.998(d)(1)(iii)(D)]
- (E) “Repair delayed” and the reason for the delay if a leak is not repaired within 15 days after discovery of the leak. The Permittee may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure.
[40 CFR 63.998(d)(1)(iii)(E)]
- (F) Copies of the Periodic Reports as specified in Condition 6.2.20, if records are not maintained on a computerized database capable of generating summary reports from the records.
[40 CFR 63.998(d)(1)(iii)(F)]
- iv. For each instrumental or visual inspection conducted in accordance with Condition 3.3.23.b.i. for closed vent systems collecting regulated material from a regulated source during which no leaks are detected, the Permittee shall record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected.
[40 CFR 63.998(d)(1)(iv)]
- b. The Permittee shall keep readily accessible records of information, as applicable, for storage vessels: A record of the planned routine maintenance performed on the control system during which the control system does not meet the applicable specifications of Condition 3.3.23.a, as applicable, due to the planned routine maintenance. Such a record shall include the information specified in the following paragraphs. This information shall be submitted in the Periodic Reports as specified in Condition 6.2.20.c.
[40 CFR 63.998(d)(2)(ii)]
 - i. The first time of day and date the requirements of Condition 3.3.23.a, as applicable, were not met at the beginning of the planned routine maintenance, and
[40 CFR 63.998(d)(2)(ii)(A)]
 - ii. The first time of day and date the requirements of Condition 3.3.23.a, as applicable, were met at the conclusion of the planned routine maintenance.
[40 CFR 63.998(d)(2)(ii)(B)]
 - iii. A description of the type of maintenance performed.
[40 CFR 63.998(d)(2)(ii)(C)]

- c. Regulated source and control equipment start-up, shutdown and malfunction records. After August 12, 2023, this provision [6.2.18.c] no longer applies when demonstrating compliance with 40 CFR 63 Subpart SS.
[40 CFR 63.998(d)(3) and 40 CFR 63.2450(e)(4)(xvi)]
 - i. Records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment or of air pollution control equipment used to comply with 40 CFR 63 Subpart FFFF during which excess emissions occur.
[40 CFR 63.998(d)(3)(i)]
 - ii. For each start-up, shutdown, and malfunction during which excess emissions occur, records that the procedures specified in the source's start-up, shutdown, and malfunction plan were followed, and documentation of actions taken that are not consistent with the plan. For example, if a start-up, shutdown, and malfunction plan includes procedures for routing control device emissions to a backup control device (e.g., the incinerator for a halogenated stream could be routed to a flare during periods when the primary control device is out of service), records must be kept of whether the plan was followed. These records may take the form of a "checklist," or other form of recordkeeping that confirms conformance with the start-up, shutdown, and malfunction plan for the event.
[40 CFR 63.998(d)(3)(ii)]
- d. The Permittee shall maintain records of the information specified in the following paragraphs for closed vent systems and control devices if specified by the equipment leak provisions in 40 CFR 63 Subpart FFFF. The records specified in paragraph d.i. of this condition shall be retained for the life of the equipment. The records specified in paragraph d.ii. of this condition shall be retained for 5 years.
[40 CFR 63.998(d)(4)]
 - i. The design specifications and performance demonstrations specified in the following paragraphs.
[40 CFR 63.998(d)(4)(i)]
 - (A) Detailed schematics, design specifications of the control device, and piping and instrumentation diagrams.
[40 CFR 63.998(d)(4)(i)(A)]
 - (B) The dates and descriptions of any changes in the design specifications.
[40 CFR 63.998(d)(4)(i)(B)]
 - (C) A description of the parameter or parameters monitored, as required in a referencing subpart, to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring.
[40 CFR 63.998(d)(4)(i)(C)]

- ii. Records of operation of closed vent systems and control devices, as specified in the following paragraphs.
[40 CFR 63.998(d)(4)(ii)]
 - (A) Dates and durations when the closed vent systems and control devices required are not operated as designed as indicated by the monitored parameters.
[40 CFR 63.998(d)(4)(ii)(A)]
 - (B) Dates and durations during which the monitoring system or monitoring device is inoperative.
[40 CFR 63.998(d)(4)(ii)(B)]
 - (C) Dates and durations of start-ups and shutdowns of control devices required in this subpart.
[40 CFR 63.998(d)(4)(ii)(C)]
- e. The Permittee shall record the occurrences and the cause of periods when the monitored parameters are outside of the parameter limits documented in the Notification of Compliance Status report. This information shall also be reported in the Periodic Report.
[40 CFR 63.998(d)(5)]

6.2.20 The Permittee shall submit periodic reports in accordance with 40 CFR 63 Subpart SS for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by August 29 and February 28, respectively, following each reporting period. The reports shall contain the information detailed below.
[40 CFR 63 Subpart FFFF; 40 CFR 63 Subpart SS; 40 CFR 63.999(c)]

- a. Periodic reports shall include the reporting period dates, the total source operating time for the reporting period, and, as applicable, all information specified in this condition, including reports of periods when monitored parameters are outside their established limits.
[40 CFR 63.999(c)(1)]
- b. For closed vent systems subject to the requirements of Conditions 3.3.23 and 4.2.3, the Permittee shall submit as part of the periodic report the information specified in the following paragraphs, as applicable.
[40 CFR 63.999(c)(2)]
 - i. The information recorded in Condition 6.2.19.a.iii.B. through a.iii.E;
[40 CFR 63.999(c)(2)(i)]
 - ii. Reports of the times of all periods recorded under Condition 6.2.19.a.ii.A when the vent stream is diverted from the control device through a bypass line; and
[40 CFR 63.999(c)(2)(ii)]

- iii. Reports of all times recorded under Condition 6.2.19.a.ii.B. when maintenance is performed in car-sealed valves, when the seal is broken, when the bypass line valve position is changed, or the key for a lock-and-key type configuration has been checked out.
[40 CFR 63.999(c)(2)(iii)]
- c. For storage vessels, the Permittee shall include in each periodic report required the information specified in the following paragraphs.
[40 CFR 63.999(c)(4)]
 - i. For the 6-month period covered by the periodic report, the information recorded in Condition 6.2.20.b.i. through b.iii.
[40 CFR 63.999(c)(4)(i)]
 - ii. For the time period covered by the periodic report and the previous periodic report, the total number of hours that the control system did not meet the requirements of Condition 3.3.23.a due to planned routine maintenance.
[40 CFR 63.999(c)(4)(ii)]
 - iii. A description of the planned routine maintenance during the next 6-month periodic reporting period that is anticipated to be performed for the control system when it is not expected to meet the required control efficiency. This description shall include the type of maintenance necessary, planned frequency of maintenance, and expected lengths of maintenance periods.
[40 CFR 63.999(c)(4)(iii)]
- d. If a control device other than a flare is used to control emissions from storage vessels, the periodic report shall describe each occurrence when the monitored parameters were outside of the parameter ranges documented in the Notification of Compliance Status. The description shall include the information specified in the following paragraphs.
[40 CFR 63.999(c)(5)]
 - i. Identification of the control device for which the measured parameters were outside of the established limits, and
[40 CFR 63.999(c)(5)(i)]
 - ii. The cause for the measured parameters to be outside of the established limits.
[40 CFR 63.999(c)(5)(ii)]
- e. For process vents and transfer racks (except low throughput transfer racks), periodic reports shall include the information specified in the following paragraphs.
[40 CFR 63.999(c)(6)]
 - i. Periodic reports shall include the daily average values of monitored parameters, calculated as specified in Condition 6.2.17.c.i. for any days when the daily average value is outside the bounds as defined in Condition 6.2.18.b.iii., or the data availability requirements defined in the following paragraphs are not met,

whether these excursions are excused or unexcused excursions. For excursions caused by lack of monitoring data, the duration of periods when monitoring data were not collected shall be specified. An excursion means any of the cases listed in paragraphs e.i.A through e.i.C. of this condition.

[40 CFR 63.999(c)(6)(i)]

(A) When the daily average value of one or more monitored parameters is outside the permitted limit.

[40 CFR 63.999(c)(6)(i)(A)]

(B) When the period of control or recovery device operation is 4 hours or greater in an operating day and monitoring data are insufficient to constitute a valid hour of data for at least 75 percent of the operating hours.

[40 CFR 63.999(c)(6)(i)(B)]

(C) When the period of control or recovery device operation is less than 4 hours in an operating day and more than one of the hours during the period of operation does not constitute a valid hour of data due to insufficient monitoring data.

[40 CFR 63.999(c)(6)(i)(C)]

(D) Monitoring data are insufficient to constitute a valid hour of data as used in paragraphs e.i.B. and e.i.C. of this condition, if measured values are unavailable for any of the 15-minute periods within the hour.

[40 CFR 63.999(c)(6)(i)(D)]

40 CFR 63 Subpart UU for Equipment Leaks – Record keeping and Reporting

6.2.21 If the Permittee owns or operates more than one regulated source subject to the provisions of Subpart UU, they may comply with the recordkeeping requirements for these regulated sources in one recordkeeping system. The recordkeeping system shall identify each record by regulated source and the type of program being implemented (e.g., quarterly monitoring, quality improvement) for each type of equipment. The records required by 40 CFR 63 Subpart UU are summarized in Conditions 6.2.12 and 6.2.13.

[40 CFR 63 Subpart UU; 40 CFR 63.1038(a)]

6.2.22 The Permittee shall maintain the following general equipment leak records for equipment subject to 40 CFR 63 Subpart UU.

[40 CFR 63 Subpart UU; 40 CFR 63.1038(b)]

a. As specified in Condition 3.3.27.a and 3.3.27.b, the Permittee shall keep general and specific equipment identification if the equipment is not physically tagged and the Permittee is electing to identify the equipment subject to 40 CFR 63 Subpart UU through written documentation such as a log or other designation.

[40 CFR 63.1038(b)(1)]

- b. The Permittee shall keep a written plan as specified in Condition 3.3.25.c.iv. and c.v. for any equipment that is designated as unsafe- or difficult-to-monitor.
[40 CFR 63.1038(b)(2)]
 - c. The Permittee shall maintain a record of the identity and an explanation as specified in Condition 3.3.23.d.ii. for any equipment that is designated as unsafe-to-repair.
[40 CFR 63.1038(b)(3)]
 - d. The Permittee shall keep records associated with the determination that equipment is in heavy liquid service as specified in Condition 3.3.25.d.
[40 CFR 63.1038(b)(5)]
 - e. The Permittee shall keep records for leaking equipment as specified in Condition 3.3.27.b.
[40 CFR 63.1038(b)(6)]
 - f. The Permittee shall keep records for leak repair as specified in Condition 3.3.28.d and records for delay of repair as specified in Condition 3.3.28.c.
[40 CFR 63.1038(b)(7)]
- 6.2.23 The Permittee shall maintain the following specific equipment leak records for equipment subject to the provisions of 40 CFR 63 Subpart UU.
[40 CFR 63 Subpart UU; 40 CFR 63.1038(c)]
- a. For valves, the Permittee shall maintain the records specified in the following paragraphs.
[40 CFR 63.1038(c)(1)]
 - i. The monitoring schedule for each process unit as specified in Condition 3.3.29.a.iii.F.
[40 CFR 63.1038(c)(1)(i)]
 - ii. The valve subgrouping records specified in Condition 3.3.29.a.iv.D., if applicable.
[40 CFR 63.1038(c)(1)(ii)]
 - b. For pumps, the Permittee shall maintain the records specified in the following paragraphs.
[40 CFR 63.1038(c)(2)]
 - i. Documentation of pump visual inspections as specified in Condition 3.3.30.a.iv.
[40 CFR 63.1038(c)(2)(i)]
 - ii. Documentation of dual mechanical seal pump visual inspections as specified in Condition 3.3.30.d.i.E.
[40 CFR 63.1038(c)(2)(ii)]

- iii. For the criteria as to the presence and frequency of drips for dual mechanical seal pumps, records of the design criteria and explanations and any changes and the reason for the changes, as specified in Condition 3.3.30.d.i.A.
[40 CFR 63.1038(c)(2)(iii)]
 - c. For agitators, the Permittee shall maintain the following records:
[40 CFR 63.1038(c)(4)]
 - i. Documentation of agitator seal visual inspections as specified in Condition 3.3.31; and
[40 CFR 63.1038(c)(4)(i)]
 - ii. For the criteria as to the presence and frequency of drips for agitators, the Permittee shall keep records of the design criteria and explanations and any changes and the reason for the changes, as specified in Condition 3.3.31.c.i.F.
[40 CFR 63.1038(c)(4)(ii)]
 - d. For pressure relief devices in gas and vapor or light liquid service, the Permittee shall keep records of the dates and results of monitoring following a pressure release, as specified in Condition 3.3.33.b.iii.
[40 CFR 63.1038(c)(5)]
 - e. For a pump QIP program, the Permittee shall maintain the records specified in 40 CFR 63.1038(c)(7).
[40 CFR 63.1038(c)(7)]
- 6.2.24 The Permittee shall report the information specified in the following paragraphs, as applicable, in the Periodic Report specified in the referencing subpart for equipment subject to the provisions of 40 CFR 63 Subpart UU. Reports shall be submitted for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by August 29 and February 28, respectively, following each reporting period. The reports shall contain the information detailed below.
[40 CFR 63 Subpart UU; 40 CFR 63.1039(b)]
 - a. For the equipment specified in the following paragraphs, report in a summary format by equipment type, the number of components for which leaks were detected and for valves, pumps and connectors show the percent leakers, and the total number of components monitored. Also include the number of leaking components that were not repaired as required by Condition 3.3.28, and for valves and connectors, identify the number of components that are determined by Condition 3.3.29.b.iv. and b.v. to be nonrepairable.
[40 CFR 63.1039(b)(1)]
 - i. Valves in gas and vapor service and in light liquid service pursuant to Condition 3.3.29.a and b.
[40 CFR 63.1039(b)(1)(i)]

- ii. Pumps in light liquid service pursuant to Condition 3.3.30.a and 3.3.30.b.
[40 CFR 63.1039(b)(1)(ii)]
 - iii. Agitators in gas and vapor service pursuant to Condition 3.3.31.a.
[40 CFR 63.1039(b)(1)(iv)]
- b. Where any delay of repair is utilized pursuant to Condition 3.3.28.c, report that delay of repair has occurred and report the number of instances of delay of repair.
[40 CFR 63.1039(b)(2)]
- c. If applicable, report the valve subgrouping information specified in Condition 3.3.29.a.iv.D.
[40 CFR 63.1039(b)(3)]
- d. For pressure relief devices in gas and vapor service pursuant to Condition 3.3.33.a that are to be operated at a leak detection instrument reading of less than 500 parts per million, report the results of all monitoring to show compliance conducted within the semiannual reporting period.
[40 CFR 63.1039(b)(4)]
- e. Report, if applicable, the initiation of a monthly monitoring program for valves pursuant to Condition 3.3.29.a.iii.A.
[40 CFR 63.1039(b)(5)]
- f. Report, if applicable, the initiation of a quality improvement program for pumps pursuant to Condition 3.3.36.
[40 CFR 63.1039(b)(6)]

40 CFR 60 Subpart Db

- 6.2.25 In addition to the records required in Condition 6.2.5, the Permittee shall maintain records of the following information for each steam generating unit operating day for the No. 10 Boiler (Source Code P010). The records shall be maintained for a period of 2 years. The Permittee shall submit written reports containing the following information with the written reports required by Condition 6.1.4.
[40 CFR 60.49b(g), 40 CFR 60.49b(i), and 40 CFR 60.49b(o)]
- a. Calendar date;
 - b. The average hourly NO_x emission rates (expressed as NO₂) (lb/MMBtu heat input) measured or predicted;
 - c. The 30-day average NO_x emission rates (lb/MMBtu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly NO_x emission rates for the preceding 30 steam generating unit operating days;

- d. Identification of the steam generating unit operating days when the calculated 30-day average NO_x emission rates are in excess of the NO_x emission standards under Conditions 3.2.10.b and 3.2.10.c, with the reasons for such excess emissions as well as a description of corrective actions taken;
- e. Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;
- f. Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;
- g. Identification of “F” factor used for calculations, method of determination, and type of fuel combusted;
- h. Identification of the times when the pollutant concentration exceeded full span of the CEMS;
- i. Description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specification 2 or 3; and
- j. Results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1 of Part 60.

PART 7.0 OTHER SPECIFIC REQUIREMENTS**7.1 Operational Flexibility**

7.1.1 The Permittee may make Section 502(b)(10) changes as defined in 40 CFR 70.2 without requiring a Permit revision, if the changes are not modifications under any provisions of Title I of the Federal Act and the changes do not exceed the emissions allowable under the Permit (whether expressed therein as a rate of emissions or in terms of total emissions). For each such change, the Permittee shall provide the Division and the EPA with written notification as required below in advance of the proposed changes and shall obtain any Permits required under Rules 391-3-1-.03(1) and (2). The Permittee and the Division shall attach each such notice to their copy of this Permit.
[391-3-1-.03(10)(b)5 and 40 CFR 70.4(b)(12)(i)]

- a. For each such change, the Permittee's written notification and application for a construction Permit shall be submitted well in advance of any critical date (typically at least 3 months in advance of any commencement of construction, Permit issuance date, etc.) involved in the change, but no less than seven (7) days in advance of such change and shall include a brief description of the change within the Permitted facility, the date on which the change is proposed to occur, any change in emissions, and any Permit term or condition that is no longer applicable as a result of the change.
- b. The Permit shield described in Condition 8.16.1 shall not apply to any change made pursuant to this condition.

7.2 Off-Permit Changes

7.2.1 The Permittee may make changes that are not addressed or prohibited by this Permit, other than those described in Condition 7.2.2 below, without a Permit revision, provided the following requirements are met:
[391-3-1-.03(10)(b)6 and 40 CFR 70.4(b)(14)]

- a. Each such change shall meet all applicable requirements and shall not violate any existing Permit term or condition.
- b. The Permittee must provide contemporaneous written notice to the Division and to the EPA of each such change, except for changes that qualify as insignificant under Rule 391-3-1-.03(10)(g). Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the Permit shield in Condition 8.16.1.
- d. The Permittee shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the Permit, and the emissions resulting from those changes.

7.2.2 The Permittee shall not make, without a Permit revision, any changes that are not addressed or prohibited by this Permit, if such changes are subject to any requirements under Title IV of the Federal Act or are modifications under any provision of Title I of the Federal Act.
[Rule 391-3-1-.03(10)(b)7 and 40 CFR 70.4(b)(15)]

7.3 Alternative Requirements

[White Paper #2]
Not Applicable

7.4 Insignificant Activities

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

7.5 Temporary Sources

[391-3-1-.03(10)(d)5 and 40 CFR 70.6(e)]
Not Applicable

7.6 Short-term Activities

Not Applicable

7.7 Compliance Schedule/Progress Reports

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(4)]
None Applicable

7.8 Emissions Trading

[391-3-1-.03(10)(d)1(ii) and 40 CFR 70.6(a)(10)]
Not Applicable

7.9 Acid Rain Requirements

Not Applicable

7.10 Prevention of Accidental Releases (Section 112(r) of the 1990 CAAA)

[391-3-1-.02(10)]

7.10.1 When and if the requirements of 40 CFR Part 68 become applicable, the Permittee shall comply with all applicable requirements of 40 CFR Part 68, including the following.

- a. The Permittee shall submit a Risk Management Plan (RMP) as provided in 40 CFR 68.150 through 68.185. The RMP shall include a registration that reflects all covered processes.
- b. For processes eligible for Program 1, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a. and the following additional requirements:
 - i. Analyze the worst-case release scenario for the process(es), as provided in 40 CFR 68.25; document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint defined in 40 CFR 68.22(a); and submit in the RMP the worst-case release scenario as provided in 40 CFR 68.165.

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- ii. Complete the five-year accident history for the process as provided in 40 CFR 68.42 and submit in the RMP as provided in 40 CFR 68.168
 - iii. Ensure that response actions have been coordinated with local emergency planning and response agencies
 - iv. Include a certification in the RMP as specified in 40 CFR 68.12(b)(4)
- c. For processes subject to Program 2, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
 - i. Develop and implement a management system as provided in 40 CFR 68.15
 - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
 - iii. Implement the Program 2 prevention steps provided in 40 CFR 68.48 through 68.60 or implement the Program 3 prevention steps provided in 40 CFR 68.65 through 68.87
 - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
 - v. Submit as part of the RMP the data on prevention program elements for Program 2 processes as provided in 40 CFR 68.170
- d. For processes subject to Program 3, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
 - i. Develop and implement a management system as provided in 40 CFR 68.15
 - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
 - iii. Implement the prevention requirements of 40 CFR 68.65 through 68.87
 - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
 - v. Submit as part of the RMP the data on prevention program elements for Program 3 as provided in 40 CFR 68.175
- e. All reports and notification required by 40 CFR Part 68 must be submitted electronically using RMP*eSubmit (information for establishing an account can be found at www.epa.gov/rmp/rmpesubmit). Electronic Signature Agreements should be mailed to:

MAIL

**Risk Management Program (RMP) Reporting Center
P.O. Box 10162
Fairfax, VA 22038**

COURIER & FEDEX

**Risk Management Program (RMP) Reporting Center
CGI Federal
12601 Fair Lakes Circle
Fairfax, VA 22033**

Compliance with all requirements of this condition, including the registration and submission of the RMP, shall be included as part of the compliance certification submitted in accordance with Condition 8.14.1.

7.11 Stratospheric Ozone Protection Requirements (Title VI of the CAAA of 1990)

- 7.11.1 If the Permittee performs any of the activities described below or as otherwise defined in 40 CFR Part 82, the Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to 40 CFR 82.166.
[Note: “MVAC-like appliance” is defined in 40 CFR 82.152.]
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
- 7.11.2 If the Permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the MVAC, the Permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

7.12 Revocation of Existing Permits and Amendments

The following Air Quality Permits, Amendments, and 502(b)10 are subsumed by this permit and are hereby revoked:

Air Quality Permit and Amendment Number(s)	Dates of Original Permit or Amendment Issuance
2861-127-0002-V-06-0	August 4, 2017
2861-127-0002-V-06-1	October 24, 2018

7.13 Pollution Prevention

Not Applicable

7.14 Specific Conditions

Not Applicable

PART 8.0 GENERAL PROVISIONS**8.1 Terms and References**

- 8.1.1 Terms not otherwise defined in the Permit shall have the meaning assigned to such terms in the referenced regulation.
- 8.1.2 Where more than one condition in this Permit applies to an emission unit and/or the entire facility, each condition shall apply and the most stringent condition shall take precedence.
[391-3-1-.02(2)(a)2]

8.2 EPA Authorities

- 8.2.1 Except as identified as “State-only enforceable” requirements in this Permit, all terms and conditions contained herein shall be enforceable by the EPA and citizens under the Clean Air Act, as amended, 42 U.S.C. 7401, et seq.
[40 CFR 70.6(b)(1)]
- 8.2.2 Nothing in this Permit shall alter or affect the authority of the EPA to obtain information pursuant to 42 U.S.C. 7414, “Inspections, Monitoring, and Entry.”
[40 CFR 70.6(f)(3)(iv)]
- 8.2.3 Nothing in this Permit shall alter or affect the authority of the EPA to impose emergency orders pursuant to 42 U.S.C. 7603, “Emergency Powers.”
[40 CFR 70.6(f)(3)(i)]

8.3 Duty to Comply

- 8.3.1 The Permittee shall comply with all conditions of this operating Permit. Any Permit noncompliance constitutes a violation of the Federal Clean Air Act and the Georgia Air Quality Act and/or State rules and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. Any noncompliance with a Permit condition specifically designated as enforceable only by the State constitutes a violation of the Georgia Air Quality Act and/or State rules only and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(i)]
- 8.3.2 The Permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(ii)]
- 8.3.3 Nothing in this Permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of Permit issuance.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(f)(3)(ii)]

- 8.3.4 Issuance of this Permit does not relieve the Permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Director or any other federal, state, or local agency.
[391-3-1-.03(10)(e)1(iv) and 40 CFR 70.7(a)(6)]

8.4 Fee Assessment and Payment

- 8.4.1 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of fee shall be determined each year in accordance with the “Procedures for Calculating Air Permit Fees.”
[391-3-1-.03(9)]

8.5 Permit Renewal and Expiration

- 8.5.1 This Permit shall remain in effect for five (5) years from the issuance date. The Permit shall become null and void after the expiration date unless a timely and complete renewal application has been submitted to the Division at least six (6) months, but no more than eighteen (18) months prior to the expiration date of the Permit.
[391-3-1-.03(10)(d)1(i), (e)2, and (e)3(ii) and 40 CFR 70.5(a)(1)(iii)]
- 8.5.2 Permits being renewed are subject to the same procedural requirements, including those for public participation and affected State and EPA review, that apply to initial Permit issuance.
[391-3-1-.03(10)(e)3(i)]
- 8.5.3 Notwithstanding the provisions in 8.5.1 above, if the Division has received a timely and complete application for renewal, deemed it administratively complete, and failed to reissue the Permit for reasons other than cause, authorization to operate shall continue beyond the expiration date to the point of Permit modification, reissuance, or revocation.
[391-3-1-.03(10)(e)3(iii)]

8.6 Transfer of Ownership or Operation

- 8.6.1 This Permit is not transferable by the Permittee. Future owners and operators shall obtain a new Permit from the Director. The new Permit may be processed as an administrative amendment if no other change in this Permit is necessary, and provided that a written agreement containing a specific date for transfer of Permit responsibility coverage and liability between the current and new Permittee has been submitted to the Division at least thirty (30) days in advance of the transfer.
[391-3-1-.03(4)]

8.7 Property Rights

- 8.7.1 This Permit shall not convey property rights of any sort, or any exclusive privileges.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iv)]

8.8 Submissions

- 8.8.1 Reports, test data, monitoring data, notifications, annual certifications, and requests for revision and renewal shall be submitted to:

**Georgia Department of Natural Resources
Environmental Protection Division
Air Protection Branch
Atlanta Tradeport, Suite 120
4244 International Parkway
Atlanta, Georgia 30354-3908**

- 8.8.2 Any records, compliance certifications, and monitoring data required by the provisions in this Permit to be submitted to the EPA shall be sent to:

**Air and Radiation Division
Air Planning and Implementation Branch
U. S. EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-3104**

- 8.8.3 Any application form, report, or compliance certification submitted pursuant to this Permit shall contain a certification by a responsible official of its truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[391-3-1-.03(10)(c)2, 40 CFR 70.5(d) and 40 CFR 70.6(c)(1)]

- 8.8.4 Unless otherwise specified, all submissions under this permit shall be submitted to the Division only.

8.9 Duty to Provide Information

- 8.9.1 The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the Permit application, shall promptly submit such supplementary facts or corrected information to the Division.

[391-3-1-.03(10)(c)5]

- 8.9.2 The Permittee shall furnish to the Division, in writing, information that the Division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall also furnish to the Division copies of records that the Permittee is required to keep by this Permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the EPA, if necessary, along with a claim of confidentiality.

[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(v)]

8.10 Modifications

- 8.10.1 Prior to any source commencing a modification as defined in 391-3-1-.01(pp) that may result in air pollution and not exempted by 391-3-1-.03(6), the Permittee shall submit a Permit application to the Division. The application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. Such application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity of the plant before and after the change, and the anticipated completion date of the change. The application shall be in the form of a Georgia air quality Permit application to construct or modify (otherwise known as a SIP application) and shall be submitted on forms supplied by the Division, unless otherwise notified by the Division.
[391-3-1-.03(1) through (8)]

8.11 Permit Revision, Revocation, Reopening and Termination

- 8.11.1 This Permit may be revised, revoked, reopened and reissued, or terminated for cause by the Director. The Permit will be reopened for cause and revised accordingly under the following circumstances:
[391-3-1-.03(10)(d)1(i)]
- a. If additional applicable requirements become applicable to the source and the remaining Permit term is three (3) or more years. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if the effective date of the requirement is later than the date on which the Permit is due to expire, unless the original permit or any of its terms and conditions has been extended under Condition 8.5.3;
[391-3-1-.03(10)(e)6(i)(I)]
 - b. If any additional applicable requirements of the Acid Rain Program become applicable to the source;
[391-3-1-.03(10)(e)6(i)(II)] (Acid Rain sources only)
 - c. The Director determines that the Permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Permit; or
[391-3-1-.03(10)(e)6(i)(III) and 40 CFR 70.7(f)(1)(iii)]
 - d. The Director determines that the Permit must be revised or revoked to assure compliance with the applicable requirements.
[391-3-1-.03(10)(e)6(i)(IV) and 40 CFR 70.7(f)(1)(iv)]
- 8.11.2 Proceedings to reopen and reissue a Permit shall follow the same procedures as applicable to initial Permit issuance and shall affect only those parts of the Permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable.
[391-3-1-.03(10)(e)6(ii)]

- 8.11.3 Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Director at least thirty (30) days in advance of the date the Permit is to be reopened, except that the Director may provide a shorter time period in the case of an emergency.
[391-3-1-.03(10)(e)6(iii)]
- 8.11.4 All Permit conditions remain in effect until such time as the Director takes final action. The filing of a request by the Permittee for any Permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, shall not stay any Permit condition.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iii)]
- 8.11.5 A Permit revision shall not be required for changes that are explicitly authorized by the conditions of this Permit.
- 8.11.6 A Permit revision shall not be required for changes that are part of an approved economic incentive, marketable Permit, emission trading, or other similar program or process for change which is specifically provided for in this Permit.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(8)]

8.12 Severability

- 8.12.1 Any condition or portion of this Permit which is challenged, becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this Permit.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(5)]

8.13 Excess Emissions Due to an Emergency

- 8.13.1 An “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the Permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(1)]
- 8.13.2 An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the Permittee demonstrates, through properly signed contemporaneous operating logs or other relevant evidence, that:
 - a. An emergency occurred and the Permittee can identify the cause(s) of the emergency;
 - b. The Permitted facility was at the time of the emergency being properly operated;

- c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in the Permit; and
 - d. The Permittee promptly notified the Division and submitted written notice of the emergency to the Division within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 8.13.3 In an enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency shall have the burden of proof.
[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(4)]
- 8.13.4 The emergency conditions listed above are in addition to any emergency or upset provisions contained in any applicable requirement.
[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(5)]

8.14 Compliance Requirements

8.14.1 Compliance Certification

The Permittee shall provide written certification to the Division and to the EPA, at least annually, of compliance with the conditions of this Permit. The annual written certification shall be postmarked no later than February 28 of each year and shall be submitted to the Division and to the EPA. The certification shall include, but not be limited to, the following elements:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(5)]

- a. The identification of each term or condition of the Permit that is the basis of the certification;
- b. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent, based on the method or means designated in paragraph c below. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
- c. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;
- d. Any other information that must be included to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and

- e. Any additional requirements specified by the Division.

8.14.2 Inspection and Entry

- a. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the Division to perform the following:
[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(2)]
 - i. Enter upon the Permittee's premises where a Part 70 source is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this Permit;
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this Permit; and
 - iv. Sample or monitor any substances or parameters at any location during operating hours for the purpose of assuring Permit compliance or compliance with applicable requirements as authorized by the Georgia Air Quality Act.
- b. No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for Permit revocation and assessment of civil penalties.
[391-3-1-.07 and 40 CFR 70.11(a)(3)(i)]

8.14.3 Schedule of Compliance

- a. For applicable requirements with which the Permittee is in compliance, the Permittee shall continue to comply with those requirements.
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(A)]
- b. For applicable requirements that become effective during the Permit term, the Permittee shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(B)]
- c. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of Permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(C)]

8.14.4 Excess Emissions

- a. Excess emissions resulting from startup, shutdown, or malfunction of any source which occur though ordinary diligence is employed shall be allowed provided that:
[391-3-1-.02(2)(a)7(i)]

- i. The best operational practices to minimize emissions are adhered to;
 - ii. All associated air pollution control equipment is operated in a manner consistent with good air pollution control practice for minimizing emissions; and
 - iii. The duration of excess emissions is minimized.
- b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction are prohibited and are violations of Chapter 391-3-1 of the Georgia Rules for Air Quality Control.
[391-3-1-.02(2)(a)7(ii)]
- c. The provisions of this condition and Georgia Rule 391-3-1-.02(2)(a)7 shall apply only to those sources which are not subject to any requirement under Georgia Rule 391-3-1-.02(8) – New Source Performance Standards or any requirement of 40 CFR, Part 60, as amended concerning New Source Performance Standards.
[391-3-1-.02(2)(a)7(iii)]

8.15 Circumvention

State Only Enforceable Condition.

- 8.15.1 The Permittee shall not build, erect, install, or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of the pollutants in the gases discharged into the atmosphere.
[391-3-1-.03(2)(c)]

8.16 Permit Shield

- 8.16.1 Compliance with the terms of this Permit shall be deemed compliance with all applicable requirements as of the date of Permit issuance provided that all applicable requirements are included and specifically identified in the Permit.
[391-3-1-.03(10)(d)6]
- 8.16.2 Any Permit condition identified as “State only enforceable” does not have a Permit shield.

8.17 Operational Practices

- 8.17.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate the source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on any information available to the Division that may include, but is not limited to, monitoring results, observations of the opacity or other characteristics of

emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source.

[391-3-1-.02(2)(a)10]

State Only Enforceable Condition.

- 8.17.2 No person owning, leasing, or controlling, the operation of any air contaminant sources shall willfully, negligently or through failure to provide necessary equipment or facilities or to take necessary precautions, cause, permit, or allow the emission from said air contamination source or sources, of such quantities of air contaminants as will cause, or tend to cause, by themselves, or in conjunction with other air contaminants, a condition of air pollution in quantities or characteristics or of a duration which is injurious or which unreasonably interferes with the enjoyment of life or use of property in such area of the State as is affected thereby. Complying with Georgia's Rules for Air Quality Control Chapter 391-3-1 and Conditions in this Permit, shall in no way exempt a person from this provision.

[391-3-1-.02(2)(a)1]

8.18 Visible Emissions

- 8.18.1 Except as may be provided in other provisions of this Permit, the Permittee shall not cause, let, suffer, permit or allow emissions from any air contaminant source the opacity of which is equal to or greater than forty (40) percent.

[391-3-1-.02(2)(b)1]

8.19 Fuel-burning Equipment

- 8.19.1 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, in operation or under construction on or before January 1, 1972 in amounts equal to or exceeding 0.7 pounds per million BTU heat input.

[391-3-1-.02(2)(d)]

- 8.19.2 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, constructed after January 1, 1972 in amounts equal to or exceeding 0.5 pounds per million BTU heat input.

[391-3-1-.02(2)(d)]

- 8.19.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any fuel-burning equipment constructed or extensively modified after January 1, 1972, visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.

[391-3-1-.02(2)(d)]

8.20 Sulfur Dioxide

- 8.20.1 Except as may be specified in other provisions of this Permit, the Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in any fuel burning source that has a heat input capacity below 100 million Btu's per hour.
[391-3-1-.02(2)(g)]

8.21 Particulate Emissions

- 8.21.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, let, permit, suffer, or allow the rate of emission from any source, particulate matter in total quantities equal to or exceeding the allowable rates shown below. Equipment in operation, or under construction contract, on or before July 2, 1968, shall be considered existing equipment. All other equipment put in operation or extensively altered after said date is to be considered new equipment.
[391-3-1-.02(2)(e)]

- a. The following equations shall be used to calculate the allowable rates of emission from new equipment:

$$E = 4.1P^{0.67}; \text{ for process input weight rate up to and including 30 tons per hour.}$$
$$E = 55P^{0.11} - 40; \text{ for process input weight rate above 30 tons per hour.}$$

- b. The following equation shall be used to calculate the allowable rates of emission from existing equipment:

$$E = 4.1P^{0.67}$$

In the above equations, E = emission rate in pounds per hour, and
P = process input weight rate in tons per hour.

8.22 Fugitive Dust

[391-3-1-.02(2)(n)]

- 8.22.1 Except as may be specified in other provisions of this Permit, the Permittee shall take all reasonable precautions to prevent dust from any operation, process, handling, transportation or storage facility from becoming airborne. Reasonable precautions that could be taken to prevent dust from becoming airborne include, but are not limited to, the following:
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;

- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
- d. Covering, at all times when in motion, open bodied trucks transporting materials likely to give rise to airborne dusts; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

8.22.2 The opacity from any fugitive dust source shall not equal or exceed 20 percent.

8.23 Solvent Metal Cleaning

8.23.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, suffer, allow, or permit the operation of a cold cleaner degreaser subject to the requirements of Georgia Rule 391-3-1-.02(2)(ff) "Solvent Metal Cleaning" unless the following requirements for control of emissions of the volatile organic compounds are satisfied:
[391-3-1-.02(2)(ff)1]

- a. The degreaser shall be equipped with a cover to prevent escape of VOC during periods of non-use,
- b. The degreaser shall be equipped with a device to drain cleaned parts before removal from the unit,
- c. If the solvent volatility is 0.60 psi or greater measured at 100 °F, or if the solvent is heated above 120 °F, then one of the following control devices must be used:
 - i. The degreaser shall be equipped with a freeboard that gives a freeboard ratio of 0.7 or greater, or
 - ii. The degreaser shall be equipped with a water cover (solvent must be insoluble in and heavier than water), or
 - iii. The degreaser shall be equipped with a system of equivalent control, including but not limited to, a refrigerated chiller or carbon adsorption system.
- d. Any solvent spray utilized by the degreaser must be in the form of a solid, fluid stream (not a fine, atomized or shower type spray) and at a pressure which will not cause excessive splashing, and
- e. All waste solvent from the degreaser shall be stored in covered containers and shall not be disposed of by such a method as to allow excessive evaporation into the atmosphere.

8.24 Incinerators

- 8.24.1 Except as specified in the section dealing with conical burners, no person shall cause, let, suffer, permit, or allow the emissions of fly ash and/or other particulate matter from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", in amounts equal to or exceeding the following:
[391-3-1-.02(2)(c)1-4]
- a. Units with charging rates of 500 pounds per hour or less of combustible waste, including water, shall not emit fly ash and/or particulate matter in quantities exceeding 1.0 pound per hour.
 - b. Units with charging rates in excess of 500 pounds per hour of combustible waste, including water, shall not emit fly ash and/or particulate matter in excess of 0.20 pounds per 100 pounds of charge.
- 8.24.2 No person shall cause, let, suffer, permit, or allow from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.
- 8.24.3 No person shall cause or allow particles to be emitted from an incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" which are individually large enough to be visible to the unaided eye.
- 8.24.4 No person shall operate an existing incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" unless:
- a. It is a multiple chamber incinerator;
 - b. It is equipped with an auxiliary burner in the primary chamber for the purpose of creating a pre-ignition temperature of 800°F; and
 - c. It has a secondary burner to control smoke and/or odors and maintain a temperature of at least 1500°F in the secondary chamber.

8.25 Volatile Organic Liquid Handling and Storage

- 8.25.1 The Permittee shall ensure that each storage tank subject to the requirements of Georgia Rule 391-3-1-.02(2)(vv) "Volatile Organic Liquid Handling and Storage" is equipped with submerged fill pipes. For the purposes of this condition and the permit, a submerged fill pipe is defined as any fill pipe with a discharge opening which is within six inches of the tank bottom.
[391-3-1-.02(2)(vv)(1)]

8.26 Use of Any Credible Evidence or Information

- 8.26.1 Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit, for the purpose of submission of compliance certifications or establishing whether or not a person has violated or is in violation of any emissions limitation or standard, nothing in this permit or any Emission Limitation or Standard to which it pertains, shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
[391-3-1-.02(3)(a)]

8.27 Internal Combustion Engines

- 8.27.1 For diesel-fired internal combustion engine(s) manufactured after April 1, 2006 or modified/reconstructed after July 11, 2005, the Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart IIII - "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines." Such requirements include but are not limited to:
[40 CFR 60.4200]
- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart IIII.
 - b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart IIII.
 - c. Conduct engine maintenance prescribed by the engine manufacturer in accordance with Subpart IIII.
 - d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart IIII. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
 - e. Maintain any records in accordance with Subpart IIII
 - f. Maintain a list of engines subject to 40 CFR 60 Subpart IIII, including the date of manufacture.[391-3-1-.02(6)(b)]
- 8.27.2 The Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart JJJJ - "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines," for spark ignition internal combustion engines(s) (gasoline, natural gas, liquefied petroleum gas or propane-fired) manufactured after July 1, 2007 or modified/reconstructed after June 12, 2006.
[40 CFR 60.4230]

- 8.27.3 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart ZZZZ - "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines."

For diesel-fired emergency generator engines defined as "existing" in 40 CFR 63 Subpart ZZZZ (constructed prior to June 12, 2006 for area sources of HAP, constructed prior to June 12, 2006 for ≤500hp engines at major sources, and constructed prior to December 19, 2002 for >500hp engines at major sources of HAP), such requirements (if applicable) include but are not limited to:

[40 CFR 63.6580]

- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart ZZZZ.
- b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart ZZZZ.
- c. Conduct the following in accordance with Subpart ZZZZ.
 - i. Change oil and filter every 500 hours of operation or annually, whichever comes first
 - ii. Inspect air cleaner every 1000 hours of operation or annually, whichever comes first and replace as necessary
 - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first and replace as necessary.
- d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart ZZZZ. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
- e. Maintain any records in accordance with Subpart ZZZZ
- f. Maintain a list of engines subject to 40 CFR 63 Subpart ZZZZ, including the date of manufacture.[391-3-1-.02(6)(b)]

8.28 Boilers and Process Heaters

- 8.28.1 If the facility/site is an area source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart JJJJJ - "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers."
[40 CFR 63.11193]

Title V Permit

Pinova, Inc.

Permit No.: 2861-127-0002-V-07-0

- 8.28.2 If the facility/site is a major source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart DDDDD - "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters."
[40 CFR 63.7480]

Attachments

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of References

List Of Standard Abbreviations

[illegible]

ATTACHMENT B

NOTE: Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Mobile Sources	1. Cleaning and sweeping of streets and paved surfaces	
Combustion Equipment	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:	
	i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.	
	ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.	
	iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	
	4. Stationary engines burning:	
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-1-.02(2)(mmm).7	
	ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.	
	iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.	5
	iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	
Trade Operations	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	99*
Maintenance, Cleaning, and Housekeeping	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	
	2. Portable blast-cleaning equipment.	8
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	10
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	

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INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Laboratories and Testing	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	2
Pollution Control	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	1
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	1
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
Industrial Operations	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour:	
	i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.	
	ii) Porcelain enameling furnaces or porcelain enameling drying ovens.	
	iii) Kilns for firing ceramic ware.	
	iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	
	v) Bakery ovens and confection cookers.	
	vi) Feed mill ovens.	
	vii) Surface coating drying ovens	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that:	
	i) Activity is performed indoors; &	
	ii) No significant fugitive particulate emissions enter the environment; &	
	iii) No visible emissions enter the outdoor atmosphere.	
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	

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INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and Equipment	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	16
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	12
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	400**

* The facility does not have an exact count of these items, but it is less than 100.

**These tanks are also included under Item 1 (petroleum liquid storage tanks less than 0.5 psia).

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
WWF1 - Station 17 Oils API Separator	1
EBF4 - Station 15 Wastewater Sump	1
TEG1 - Non Kb Storage Tanks (including CB09, EW01-EW03, T006, BS03, FT01, FT02, PS01-PS06, PW04, PW11, PW14, PW15, PSS1, PST2, PWG1, PWG2, PWW1, T105, C001, C002, C008, W097, Y030, Y040, Y052, T31A, T31B & T31C)	34
SF02 - W Tank Farm	varies
SF03 - Y Tank Farm	varies
SF03 - Y Tank Farm Methane Vents (Stillhouse area)	9
HT80 - Hard Resins T-80 Tank	1
HT81 - Hard Resins T-81 Tank	1
T209 - Mercene T-209-1A Tank	1
T200 - Mercene Grade β -Pinene T-200-1A Tank	1
RS02 - Resin 731 RS-2 Tank	1
Neutralization Basin (WWF4)	1
Solids Drying Beds (WWF5)	4
Solids Drying Beds Wastewater Sump (WWF6)	1
Millpond (MF07)	1
Clarifier (MF08)	1
Primary Rework Melter (EBF3)	1

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INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
Crown Area Sump (EAF4)	1
Vinsol Pit (PXF2)	1
Closed Loop Condenser Cleaning (PXF3)	NA
Station 13 Wastewater Sump (PXF4)	1
Station 14 Wastewater Sump (PXF5)	1
Station 14A Wastewater Sump (PXF6)	1
Pexite Recovery Sump (PXF7)	1
Dresinate Digester (R002)	1
Resin 731 Still (R003)	1
Resin 731SA Kettle (R004)	1
Size Area Rosin Melter (R005)	1
Drop Tank Cooler (R009)	1
Resin 731 VOC Equipment Leaks (RF02)	NA
Station 12 Wastewater Sump (RF03)	1
Resin 731 Tanktruck Loading Station - West (RF04)	1
Resin 731 Tanktruck Loading Station - East (RF05)	1
Resin 731SA Kettle Soda Ash Hopper (RF06)	1
Dresinate7 Rosin Soap Drumming (RF07)	NA
Gum Rosin Loading/Unloading (RF09)	1
Resin 731 Tank Car Loading Station (RF10)	1
Para-cymene VOC Equipment Leaks (PAF1)	NA
Staybelite VOC Equipment Leaks (SAF2)	NA
Station 2 Wastewater Sump (SAF3)	1
Staybelite Tanktruck/Railcar Loading Station (SAF4)	1
Pexoil Drumming (SAF5)	NA
Staybelite/Foral Catalyst Change (SA06)	NA
AA-Kettle R-30 Feed Hopper (HR4A)	1
AB-Kettle R-20 Feed Hopper (HR4B)	1
AC-Kettle R-10 Feed Hopper (HR4C)	1
AD-Kettle R-40 Feed Hopper (HR4D)	1

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INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
AE-Kettle R-50 Feed Hopper (HR4E)	1
AF-Kettle R-60 Feed Hopper (HR4F)	1
Vacuum System Including Hot Well T-30 (HR05)	1
North/SRA Flaking Belt Hood (HR06)	1
Middle/HRA Flaking Belt Hood (HR07)	1
South/TRA Flaking Belt Hood (HR08)	1
Vent Tank T-32 (HR09)	1
Hard Resins VOC Equipment Leaks (HRF2)	NA
Rosin Drumming (HRF3)	NA
Hard Resins Drumming (HRF4)	NA
Terpene Resins Drumming (HRF5)	NA
Station 3 Wastewater Sump (HRF6)	1
Hard Resins Tanktruck Loading and Unloading Station (HRF7)	1
Hard Resins Tanktruck Loading Station (West) (HRF14)	1
Rosin Shed Tanktruck and Railcar Loading/Unloading Stations (HRF8)	2
Hard Resins Melter (HRF9)	1
Terpene Resins Filter Cake Collection (TR05)	1
Storage Tank Vent Header Seal Pot (TR06)	1
Hardener Tank S-38 (TR09)	1
Refrigeration Unit - Hasegawa (TRF3)	1
Refrigeration Unit - Vilter (TRF4)	1
Neutralization Tank T-15-A (TRF5)	1
Neutralization Tank T-15-B (TRF6)	1
Station 19 Wastewater Sump (TRF7)	1
Terpene Resins Tanktruck Station (TRF8)	1
Terpene Resins Railcar Station (TRF9)	1
SCP Belt Press Filter (SP05)	1
SCP Resins VOC Equipment Leaks (SPF2)	NA
SCP/S-3057 HAP Equipment Leaks (SPF3)	NA
Station 9 Wastewater Sump (SPF4)	1

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Description of Emission Units / Activities	Quantity
Station 22 Wastewater Sump (SPF5)	1
Loading and Unloading Station - East (SPF6)	1
Loading and Unloading Station - West (SPF7)	1
SCP Resins Drumming (SPF8)	NA
Vinsol Ester Gum Drumming (SPF9)	NA
Therminol Vent Header (LR03)	1
Liquid Resins Drumming (LRF3)	NA
Station 11 Wastewater Sump (LRF4)	1
Liquid Resins Open Effluent Sewer (LRF5)	NA
Settling Tank RP-4 (CP05)	1
Settling Tank AT-8 (CP06)	1
Neutralization Tank CB-1 (CP07)	1
Neutralization Tank CB-4 (CP08)	1
Chemical Plant VOC Equipment Leaks (CPF1)	NA
Station 5 Wastewater Sump (CPF2)	1
Sulfate Anethole Crystallizer Tank (AC01) (no longer in service)	1
Anethole Centrifuge (AC02) (no longer in service)	1
Anethole Chiller (AC03) (no longer in service)	1
Sulfate Turps VOC Equipment Leaks (STF1)	NA
Sulfate Turps Wastewater Sump (STF2)	1
PML Unloading Station (STF3)	1
Station 6 Wastewater Sump (STF4)	1
Batch Still No. 13 (S013)	1
Batch Still No. 17 (S017)	1
Continuous Still No. 23 (S023) (no longer in service)	1
Continuous Still No. 15 (S015) (no longer in service)	1
Continuous Stills No. 35A and 35B (S035) (no longer in service)	2
Anethole Isomerizer (S041) (no longer in service)	1
Wastewater Sparge Tank at No.29 Still (SF4A)	1
Quiet Tank at No. 29 Still (SF4B)	1

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Description of Emission Units / Activities	Quantity
Station 16 Wastewater Sump (SF05)	1
Still House Raw Material Unloading Station (SF07)	1
Still House Railcar Station (SF06)	1
Still House Railcar Station (SF09)	1
Still House Tank (Y80A)	1
Still House Tank (Y80B)	1
Supersack Bagging Machine/Silos (V01C)	1
Pulverizing Mill - West (V002)	1
Flaking Room Inside Silos (V004)	2
Pulverizing Mill - East (V005)	1
West Pulverizing Mill Conveyor (V006)	1
East Heat Treat Tank (V009)	1
West Heat Treat Tank (V010)	1
Vinsol Storage Bins (VF05)	2
Vinsol Railcar Station (VF06)	1
Vinsol Truck Loading Stations (VF07)	4
Vinsol Vacuum System (V011)	1
Liquid Loading Area VOC Equipment Leaks (LLF1)	NA
Station 4 Wastewater Sump (LLF2)	1
Liquid Terpenes Drumming (LLF4)	NA
Liquid Loading Area Tanktruck Station - Drums (LLF3)	1
Liquid Loading Area Tanktruck and Railcar Loading Station - Drums (LLF5)	1
Station 20 Wastewater Sump (TCF1)	1
Tank Car Cleaning (TCF2)	1
Rosin Solution Utility Tanks (CS01, CS02, CS03, CS04)	4
Vent Catch Tank PW03	1
Still House Residues Tank F003	1
Recovered MIBK Tank W041	1
Recovered MIBK Tank W042	1
Chemical Plant Recovery Tank ST03	1

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INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
Topper Column Overhead Product Tank ST06 (no longer in service)	1
Terpene Resin Oils Tank T36A	1
Terpene Resin Oils Tank T36B	1
Station 7 Wastewater Sump	1
Station 8 Wastewater Sump	1
Station 10 Wastewater Sump	1
Railroad Station Wastewater Sump	1
Blowing and Unplugging Rosin Lines	NA
Open Trench Drains at Station 17 Oils API Separator	NA
Open Trench Drains at Extraction Area	NA
Open Trench Drains at Refinery Area	NA
Open Trench Drains at Crown Area	NA
Open Trench Drains at Pexite Plant Area	NA
Open Trench Drains at Resin 731 Area	NA
Open Trench Drains at Staybelite Area	NA
Open Trench Drains at Hard Resins Area	NA
Open Trench Drains at Terpene Resins Area	NA
Open Trench Drains at SCP Resins Area	NA
Open Trench Drains at SCP/S-3057 Area	NA
Open Trench Drains at S-3057 Belt Filter Press Building	NA
Open Trench Drains at SCP Unloading Station Area	NA
Open Trench Drains at SCP/Liquid Resins Area	NA
Open Trench Drains at Chemical Plant Area	NA
Open Trench Drains at PML Unloading Area	NA
Open Trench Drains at Sulfate Turps Pad	NA
Open Trench Drains at Stillhouse Area	NA
Open Trench Drains at Liquid Loading Area	NA
Open Trench Drains at Tank Car Cleaning Area	NA
Open Trench Drains at Pilot Plant Area	NA
Hot Well at Resin 731 Area	1

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INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
Hot Well at Staybelite Area	1
Hot Well at Hard Resins Area	1
Hot Well at Terpene Resins Area	1
Hot Well at SCP Area	1
Hazardous Waste Drum Storage Unit	1
Laboratory Satellite Accumulation Area	1
Laboratory Drum Storage/Handling Area	1
Myrcene Process (shut down)	1
SodaAsh Bag Dump Station/Pneumatic Conveyor AG30 (G-301-30)	1
Pyrolysis Furnace (B-204-1) Burner (A01B)	1
Myrcene Decanter (T-206-1) (A01D) (shut down)	1
Equalization Tanks (WWF3) Replace equalization Basin in June of 1998	2
Staybelite / Foral Tanks	2
Rosin 3 Surge Tank (T065)	1
Oil Water Separator Tank (R001)	1
Terpin Hydrate Oils Tank (T051)	1
No.3 Distillate Tank (T025)	1
Refinery No.2 Crude Tank (T009)	1
Crude Terpeneol Surge Tank (T062)	1
Crude Terpeneol Converter (THC5)	1
Refinery Oil Recovery Tank (R003)	1
Water Removal Tank for CST (ST11) (not in service)	1
Hard Resins Glycerine Tank (T05R)	1
Aluminum Chloride Storage Silo (TR01)	1
Amine Blending Operations	1

ATTACHMENT B (continued)**GENERIC EMISSION GROUPS**

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Emissions Units / Activities	Number of Units (if appropriate)	Applicable Rules		
		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)
PFG1 – Sawdust Handling				X
MF01 – Stumpwood Storage Piles (Currently there are 4 – MR1, X09, X10, X22)	varies			X

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Fuel Burning Equipment	Number of Units
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	2
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	4
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	0

ATTACHMENT C**LIST OF REFERENCES**

1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.
2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.
3. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.*
4. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees.*
5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at www.epa.gov/ttn/chief/ap42/index.html.
6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at www.epa.gov/ttn/chief/software/tanks/index.html.
7. The Clean Air Act (42 U.S.C. 7401 et seq).
8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).
9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).